



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

November 9, 2007

Gary Fields, Treasurer  
American Bankers Association PAC (BankPac)  
1120 Connecticut Avenue NW  
Washington, DC 20036

**Response Due Date:  
December 11, 2007**

Identification Number: C00004275

Reference: October Monthly Report (9/1/07-9/30/07)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 3 items:

1. Schedule A of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §§110.1(d) and 110.2(d) prohibit a committee and its apparent affiliates from receiving any contribution from another political committee or person in excess of \$5,000 per calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information.

If any contribution you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if within 60 days of receipt, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution. Any request from a donor for a refund must be honored.

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Alternatively, the funds can be retained if within 60 days of receipt you (1) transferred the excessive amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund. Any request from a donor for a refund must be honored.

If the foregoing conditions for reattributions or transfers to a non-federal account were not met within 60 days of receipt, the excessive amount must be refunded.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

2. Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a multicandidate committee and its apparent affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation 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.

3. Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a committee and its apparent affiliates from making contributions to another political committee in excess of \$5,000 per calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have made an excessive contribution, you must notify the recipient and request a refund of the amount in excess of \$5,000. The refund of the excessive amount must be made within sixty (60) days of receipt of the contribution.

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.

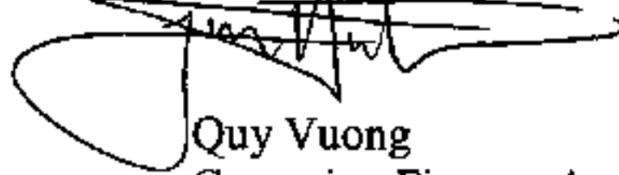
Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund will be taken into consideration.

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

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Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1148.

Sincerely,



Quy Vuong  
Campaign Finance Analyst  
Reports Analysis Division

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**Excessive Contribution(s) From a Committee(s)**

| Contributor Name                                       | Date      | Amount  | Report               | Recipient Affiliate  |
|--|-----------|---------|----------------------|--|
| Washington Mutual Political Action Committee (WAMUPAC) | 3/2/2007  | \$5,000 | 2007 March Monthly   | America's Community Bankers Community Campaign Committee     |
| Washington Mutual Political Action Committee (WAMUPAC) | 4/16/2007 | \$3,000 | 2007 May Monthly     | Texas Bankers Association-Bankers Political Action Committee |
| Washington Mutual Political Action Committee (WAMUPAC) | 9/21/2007 | \$5,000 | 2007 October Monthly | American Bankers Association PAC (BankPac)                   |

**Excessive Contribution(s) to Candidate(s) with an Affiliated Committee(s)**

| Recipient Name         | Date      | Amount  | Election | Report                 | Contributing Affiliate                                   |
|------------------------|-----------|---------|----------|------------------------|--|
| Friends of Jim Clyburn | 3/2/2007  | \$1,000 | P-2008   | 2007 April Monthly     | American Bankers Association PAC (BankPac)               |
| Friends of Jim Clyburn | 3/12/2007 | \$2,500 | P-2008   | 2007 April Monthly     | American Bankers Association PAC (BankPac)               |
| Friends of Jim Clyburn | 8/28/2007 | \$1,000 | P-2008   | 2007 September Monthly | America's Community Bankers Community Campaign Committee |
| Friends of Jim Clyburn | 9/17/2007 | \$1,500 | P-2008   | 2007 October Monthly   | American Bankers Association PAC (BankPac)               |

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AMERICAN BANKERS ASSOCIATION PAC (BANKPAC)

| Recipient Name                             | Date      | Amount  | Election | Report                | Contributing Affiliate                                   |
|--|-----------|---------|----------|-----------------------|--|
| Maloney for Congress                       | 1/30/2007 | \$1,000 | P-2008   | 2007 February Monthly | America's Community Bankers Community Campaign Committee |
| Maloney for Congress                       | 3/2/2007  | \$2,000 | P-2008   | 2007 April Monthly    | America's Community Bankers Community Campaign Committee |
| Maloney for Congress                       | 3/26/2007 | \$1,000 | P-2008   | 2007 April Monthly    | American Bankers Association PAC (BankPac)               |
| Maloney for Congress                       | 5/24/2007 | \$1,000 | P-2008   | 2007 June Monthly     | America's Community Bankers Community Campaign Committee |
| Maloney for Congress                       | 7/26/2007 | \$1,000 | P-2008   | 2007 August Monthly   | America's Community Bankers Community Campaign Committee |
| Maloney for Congress                       | 9/27/2007 | \$2,000 | P-2008   | 2007 October Monthly  | American Bankers Association PAC (BankPac)               |
| Walter Jones for Congress Committee (2008) | 4/25/2007 | \$1,000 | P-2008   | 2007 May Monthly      | America's Community Bankers Community Campaign Committee |

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AMERICAN BANKERS ASSOCIATION PAC (BANKPAC)

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| Recipient Name                             | Date      | Amount  | Election | Report               | Contributing Affiliate                                   |
|--|-----------|---------|----------|----------------------|--|
| Walter Jones for Congress Committee (2008) | 6/12/2007 | \$1,000 | P-2008   | 2007 July Monthly    | American Bankers Association PAC (BankPac)               |
| Walter Jones for Congress Committee (2008) | 9/12/2007 | \$4,000 | P-2008   | 2007 October Monthly | American Bankers Association PAC (BankPac)               |
| Friends of Carolyn McCarthy                | 3/6/2007  | \$2,500 | P-2008   | 2007 April Monthly   | American Bankers Association PAC (BankPac)               |
| Friends of Carolyn McCarthy                | 6/13/2007 | \$1,000 | P-2008   | 2007 July Monthly    | American Bankers Association PAC (BankPac)               |
| Friends of Carolyn McCarthy                | 6/27/2007 | \$1,000 | P-2008   | 2007 July Monthly    | America's Community Bankers Community Campaign Committee |
| Friends of Carolyn McCarthy                | 9/21/2007 | \$1,500 | P-2008   | 2007 October Monthly | American Bankers Association PAC (BankPac)               |
| Charles A. Gonzalez Congressional Campaign | 3/8/2007  | \$1,000 | P-2008   | 2007 April Monthly   | American Bankers Association PAC (BankPac)               |

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AMERICAN BANKERS ASSOCIATION PAC (BANKPAC)

| Recipient Name                             | Date      | Amount  | Election | Report               | Contributing Affiliate                                   |
|--|-----------|---------|----------|----------------------|--|
| Charles A. Gonzalez Congressional Campaign | 5/24/2007 | \$2,000 | P-2008   | 2007 June Monthly    | America's Community Bankers Community Campaign Committee |
| Charles A. Gonzalez Congressional Campaign | 6/13/2007 | \$1,000 | P-2008   | 2007 July Monthly    | American Bankers Association PAC (BankPac)               |
| Charles A. Gonzalez Congressional Campaign | 9/17/2007 | \$3,000 | P-2008   | 2007 October Monthly | American Bankers Association PAC (BankPac)               |
| Judy Biggert For Congress                  | 3/19/2007 | \$1,000 | P-2008   | 2007 April Monthly   | American Bankers Association PAC (BankPac)               |
| Judy Biggert For Congress                  | 5/24/2007 | \$1,000 | P-2008   | 2007 June Monthly    | America's Community Bankers Community Campaign Committee |
| Judy Biggert For Congress                  | 5/29/2007 | \$2,500 | P-2008   | 2007 June Monthly    | American Bankers Association PAC (BankPac)               |
| Judy Biggert For Congress                  | 9/17/2007 | \$1,500 | P-2008   | 2007 October Monthly | American Bankers Association PAC (BankPac)               |

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AMERICAN BANKERS ASSOCIATION PAC (BANKPAC)

| Recipient Name      | Date      | Amount  | Election | Report               | Contributing Affiliate                                   |
|---------------------|-----------|---------|----------|----------------------|--|
| Moore for Congress  | 3/12/2007 | \$2,500 | P-2008   | 2007 April Monthly   | American Bankers Association PAC (BankPac)               |
| Moore for Congress  | 5/23/2007 | \$1,000 | P-2008   | 2007 June Monthly    | America's Community Bankers Community Campaign Committee |
| Moore for Congress  | 9/12/2007 | \$2,500 | P-2008   | 2007 October Monthly | American Bankers Association PAC (BankPac)               |
| Walden for Congress | 6/5/2007  | \$3,000 | P-2008   | 2007 July Monthly    | American Bankers Association PAC (BankPac)               |
| Walden for Congress | 6/6/2007  | \$1,000 | P-2008   | 2007 July Monthly    | American Bankers Association PAC (BankPac)               |
| Walden for Congress | 6/26/2007 | \$1,000 | P-2008   | 2007 July Monthly    | America's Community Bankers Community Campaign Committee |
| Walden for Congress | 9/12/2007 | \$1,000 | P-2008   | 2007 October         | American Bankers Association PAC (BankPac)               |

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AMERICAN BANKERS ASSOCIATION PAC (BANKPAC)

| Recipient Name      | Date      | Amount  | Election | Report                     | Contributing Affiliate  |
|---------------------|-----------|---------|----------|----------------------------|---|
| Rogers for Congress | 2/14/2007 | \$1,500 | P-2008   | 2007<br>March<br>Monthly   | America's<br>Community<br>Bankers<br>Community<br>Campaign<br>Committee |
| Rogers for Congress | 3/20/2007 | \$1,000 | P-2008   | 2007 April<br>Monthly      | American<br>Bankers<br>Association<br>PAC<br>(BankPac)                  |
| Rogers for Congress | 4/20/2007 | \$2,500 | P-2008   | 2007 May<br>Monthly        | American<br>Bankers<br>Association<br>PAC<br>(BankPac)                  |
| Rogers for Congress | 9/12/2007 | \$1,500 | P-2008   | 2007<br>October<br>Monthly | American<br>Bankers<br>Association<br>PAC<br>(BankPac)                  |
| Putnam for Congress | 4/9/2007  | \$1,000 | P-2008   | 2007 May<br>Monthly        | American<br>Bankers<br>Association<br>PAC<br>(BankPac)                  |
| Putnam for Congress | 5/4/2007  | \$1,000 | P-2008   | 2007 June<br>Monthly       | American<br>Bankers<br>Association<br>PAC<br>(BankPac)                  |
| Putnam for Congress | 6/19/2007 | \$1,000 | P-2008   | 2007 July<br>Monthly       | American<br>Bankers<br>Association<br>PAC<br>(BankPac)                  |

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AMERICAN BANKERS ASSOCIATION PAC (BANKPAC)

| Recipient Name               | Date      | Amount  | Election | Report               | Contributing Affiliate                                   |
|------------------------------|-----------|---------|----------|----------------------|--|
| Putnam for Congress          | 7/26/2007 | \$1,000 | P-2008   | 2007 August Monthly  | America's Community Bankers Community Campaign Committee |
| Putnam for Congress          | 9/12/2007 | \$2,000 | P-2008   | 2007 October Monthly | American Bankers Association PAC (BankPac)               |
| Friends of Ginny Brown-Waite | 4/6/2007  | \$1,000 | P-2008   | 2007 May Monthly     | American Bankers Association PAC (BankPac)               |
| Friends of Ginny Brown-Waite | 5/4/2007  | \$2,000 | P-2008   | 2007 June Monthly    | American Bankers Association PAC (BankPac)               |
| Friends of Ginny Brown-Waite | 5/23/2007 | \$1,000 | P-2008   | 2007 June Monthly    | America's Community Bankers Community Campaign Committee |
| Friends of Ginny Brown-Waite | 6/14/2007 | \$1,000 | P-2008   | 2007 July Monthly    | America's Community Bankers Community Campaign Committee |
| Friends of Ginny Brown-Waite | 9/17/2007 | \$2,000 | P-2008   | 2007 October Monthly | American Bankers Association PAC (BankPac)               |

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AMERICAN BANKERS ASSOCIATION PAC (BANKPAC)

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| Recipient Name                     | Date      | Amount  | Election | Report               | Contributing Affiliate                                   |
|------------------------------------|-----------|---------|----------|----------------------|--|
| Jim Gerlach for Congress Committee | 2/14/2007 | \$1,000 | P-2008   | 2007 March Monthly   | America's Community Bankers Community Campaign Committee |
| Jim Gerlach for Congress Committee | 3/27/2007 | \$1,000 | P-2008   | 2007 April Monthly   | American Bankers Association PAC (BankPac)               |
| Jim Gerlach for Congress Committee | 4/20/2007 | \$1,000 | P-2008   | 2007 May Monthly     | American Bankers Association PAC (BankPac)               |
| Jim Gerlach for Congress Committee | 5/25/2007 | \$1,000 | P-2008   | 2007 June Monthly    | American Bankers Association PAC (BankPac)               |
| Jim Gerlach for Congress Committee | 9/6/2007  | \$2,000 | P-2008   | 2007 October Monthly | American Bankers Association PAC (BankPac)               |
| Moore for Congress                 | 3/19/2007 | \$1,000 | P-2008   | 2007 April Monthly   | American Bankers Association PAC (BankPac)               |
| Moore for Congress                 | 5/14/2007 | \$1,000 | P-2008   | 2007 June Monthly    | American Bankers Association PAC (BankPac)               |

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| Recipient Name     | Date      | Amount  | Election | Report               | Contributing Affiliate                                   |
|--------------------|-----------|---------|----------|----------------------|--|
| Moore for Congress | 5/24/2007 | \$1,000 | P-2008   | 2007 June Monthly    | America's Community Bankers Community Campaign Committee |
| Moore for Congress | 6/25/2007 | \$1,000 | P-2008   | 2007 July Monthly    | American Bankers Association PAC (BankPac)               |
| Moore for Congress | 9/12/2007 | \$2,000 | P-2008   | 2007 October Monthly | American Bankers Association PAC (BankPac)               |
| Team Sununu        | 9/19/2007 | \$1,000 | G-2008   | 2007 October Monthly | America's Community Bankers Community Campaign Committee |
| Team Sununu        | 9/27/2007 | \$5,000 | G-2008   | 2007 October Monthly | American Bankers Association PAC (BankPac)               |

**Excessive Contribution(s) to Committee(s) with an Affiliated Committee(s)**

| Recipient Name      | Date      | Amount  | Report               | Contributing Affiliate                                   |
|---------------------|-----------|---------|----------------------|--|
| Bluegrass Committee | 3/19/2007 | \$2,500 | 2007 April Monthly   | American Bankers Association PAC (BankPac)               |
| Bluegrass Committee | 7/26/2007 | \$2,500 | 2007 August Monthly  | America's Community Bankers Community Campaign Committee |
| Bluegrass Committee | 9/12/2007 | \$2,500 | 2007 October Monthly | American Bankers Association PAC (BankPac)               |

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AMERICAN BANKERS ASSOCIATION PAC (BANKPAC)

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| Recipient Name | Date      | Amount  | Report                     | Contributing Affiliate   |
|----------------|-----------|---------|----------------------------|--|
| RED PAC        | 2/28/2007 | \$1,000 | 2007<br>March<br>Monthly   | American Bankers<br>Association PAC<br>(BankPac)               |
| RED PAC        | 3/26/2007 | \$1,000 | 2007 April<br>Monthly      | America's Community<br>Bankers Community<br>Campaign Committee |
| RED PAC        | 9/25/2007 | \$4,000 | 2007<br>October<br>Monthly | American Bankers<br>Association PAC<br>(BankPac)               |

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