

**American Mid-Sized Banks PAC**

January 22, 2014

RECEIVED

2014 JAN 23 AM 11:41

FEC MAIL CENTER

Nicole Miller  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, DC 20463

**Re: American Mid-Sized Banks (AMSB) PAC's Reply to the Commission's Request for Additional Information**

Dear Ms. Miller:

This submission is in response to the Commission's Request for Additional Information dated December 19, 2013. Additionally, our committee has submitted a copy of this correspondence electronically via the FECFile software.

1. A clerical error resulted in the misreporting of the \$2,000 contribution originally attributed to the Wisconsin Bankers Association "WISCBANKPAC"). This contribution was an individual contribution from Philip Flynn, President and CEO of Associated Bank. The funds were released through the Alliance of Bankers for Wisconsin's (ABW) Conduit Fund. In transferring these funds to our committee, the ABW Conduit Fund acted as "conduit" of "directed" individual funds to candidates or committees under Section 11.06(11) of the Wisconsin Statutes and other provisions of laws governing conduit funds. This contribution was also transferred by the conduit in accordance with the laws and regulations for collected agents, 11 C.F.R. § 102.6(c), and within the specified time period after the request for transfer was made (see Federal Election Commission Advisory Opinion, No. 1996-18 (June 14, 1996)). A copy of the cover letter accompanying this contribution is attached (Attachment #1). We have amended the 2013 Mid-Year Report to properly report this contribution as an individual contribution.

2. Our Committee has requested in writing and received confirmation that the Jeff Merkley for Oregon committee will re-designate \$2,400 of the \$5,000 contribution made on June 13, 2013. Therefore, \$2,600 of this contribution will be designated to the 2014 primary election and the remaining \$2,400 of the contribution will be designated to the 2014 general election. A copy of the re-designation request and the response from Jeff Merkley for Oregon are attached (Attachment #2). We will disclose the re-designation as a memo entry on Schedule B supporting Line 23 of the report covering this month to properly report this contribution.

Please let us know if we can provide any further information.

Best,



Brent Tjarks  
AMSB PAC Treasurer

Attachments

14031160483

14031160484

# **Attachment #1**



# ALLIANCE OF BANKERS FOR WISCONSIN

Registered conduit fund of the Wisconsin Bankers Association

Date: February 1, 2013

TO: American Mid-Sized Banks PAC

From: Debra Nabholz, Treasurer -Alliance of Bankers for Wisconsin

Enclosed with this letter is an Alliance of Bankers for Wisconsin Conduit Fund check in the amount of \$2,000.00, made payable to "American Mid-Sized Banks PAC".

**Please Note:** This is not a Political Action Committee (PAC) check and should not be recorded as such. Moreover, this is not a corporate contribution. Instead, it is one check representing individual contributions that have been released through the ABW Conduit Fund to "American Mid-Sized Banks PAC". This must be recorded as an individual contribution - in the name and amount indicated below. This contribution was authorized on January 31, 2013.

\$2,000.00  
Philip Flynn  
2607 Lost Dauphin Road  
DePere, WI 54115

President and CEO  
Associated Bank  
200 N. Adams Street  
Green Bay, WI 54301

In transferring these funds to you, the ABW Conduit Fund is acting as a "conduit" of "directed" individual funds to candidates or committees under Section 11.06 (11) of the Wisconsin Statutes and other provisions of laws governing conduit funds. These contributions are also transferred by the conduit in accordance with the laws and regulations for collecting agents, 11 C.F.R. § 102.6(c), and within a specified time period after the request for transfer is made (see Federal Election Commission Advisory Opinion, No. 1996-18 (June 14, 1996)).

The Wisconsin Bankers Association is the state's largest financial industry trade group representing nearly 300 commercial banks and thrift institutions in Wisconsin. If you have any questions or need any additional information in connection with this transfer of individual contributions, I can be reached directly at (608) 441-1200.

cc: Mike Semmann, Vice President - Government Relations, Wisconsin Bankers Association  
Jay Risch, Director - Legislative Affairs, Wisconsin Bankers Association

ALLIANCE OF BANKERS FOR WISCONSIN

4721 S BILTMORE LANE  
P.O. BOX 8880  
WISCONSIN, WI 53708-8880

5490

DATE 02/01/13

12-5-750

PAY  
TO THE  
ORDER OF

American Mid-Sized Banks PAC

\$ 2,000.00

Two Thousand and 00/100

DOLLARS



BMO Harris Bank N.A.

*Debra M. Mader*

14031160486

14031160487

## **Attachment #2**

***American Mid-Sized Banks PAC***

January 17, 2014

Kevin Neely  
Treasurer  
Jeff Merkley for Oregon  
3321 SE 20<sup>th</sup> Avenue  
Portland, OR 97202

**Re: Request for Re-designation of Contribution to Jeff Merkley for Oregon**

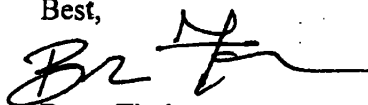
Dear Mr. Neely,

This letter is an official request for re-designation of a \$5,000.00 contribution made to the Jeff Merkley for Oregon Committee by the American Mid-Sized Banks (AMSB) Political Action Committee (PAC), dated June 13, 2013.

AMSB PAC has not yet attained multi-candidate status and is subject to a \$2,600.00 contribution limit per election. Therefore, please designate the first \$2,600.00 of the contribution to the 2014 primary election and the remaining \$2,400.00 of the contribution to the 2014 general election.

Please acknowledge receipt of this request and take the necessary steps to re-designate the contribution as soon as possible. Contact and other information for the committee is provided below. You may reply to me directly at Brent.Tjarks@cmsb.com or (213) 673-8763. Please let me know if I can provide any further information.

Best,



Brent Tjarks  
AMSB PAC Treasurer

American-Mid Sized Banks (AMSB) PAC  
555 South Flower Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90071  
Committee ID: C00501015

14031160488

**Hudson, Kevin C.**

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**From:** Kevin Neely  
**Sent:** Friday, January 17, 2014 5:11 PM  
**To:** Hudson, Kevin C.  
**Cc:** 'Tjarks, Brent'; Elise Greene  
**Subject:** RE: Request for Re-designation of Contribution made by AMSB PAC

Consider my e-mail acknowledgement that the contribution will be redesignated. Thank you for your attention to the matter.

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**From:** Hudson, Kevin C.  
**Sent:** Friday, January 17, 2014 1:49 PM  
**To:** Kevin Neely  
**Cc:** 'Tjarks, Brent'; Elise Greene  
**Subject:** RE: Request for Re-designation of Contribution made by AMSB PAC

Thanks for the quick response, Kevin.

Will the PAC receive written confirmation of the re-designation or does your email serve as such a notice?

Best,  
Kevin

Kevin Hudson  
Senior Legal Assistant  
(202) 942-6324

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**From:** Kevin Neely  
**Sent:** Friday, January 17, 2014 4:39 PM  
**To:** Hudson, Kevin C.  
**Cc:** 'Tjarks, Brent'; Elise Greene  
**Subject:** RE: Request for Re-designation of Contribution made by AMSB PAC

Confirmed. Thanks for the contribution and we'll redesignate it.

Cheers.  
Kevin

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**From:** Hudson, Kevin C.  
**Sent:** Friday, January 17, 2014 12:34 PM  
**To:** Kevin Neely  
**Cc:** 'Tjarks, Brent'  
**Subject:** Request for Re-designation of Contribution made by AMSB PAC

Dear Mr. Neely-

This message is being sent on behalf of Brent Tjarks, treasurer of the American Mid-Sized Banks PAC. The PAC is officially requesting that a contribution the PAC made to Merkley for Oregon be re-designated. Details of the request are in the attached letter, which will also be sent to you via Federal Express.

Please acknowledge receipt of this request and take the necessary steps to re-designate the contribution as soon as possible. If you have any questions or require further information, please let us know.

Best,  
Kevin

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Kevin Hudson  
Senior Legal Assistant

Arnold & Porter LLP  
555 Twelfth Street, NW  
Washington, DC 20004-1205

Telephone: 1 202.942.6324

[www.arnoldporter.com](http://www.arnoldporter.com)

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Kevin C. Hudson  
Arnold & Porter LLP  
555 12th Street, N.W.  
Washington, DC 20004

Origin ID: RDVA

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Express

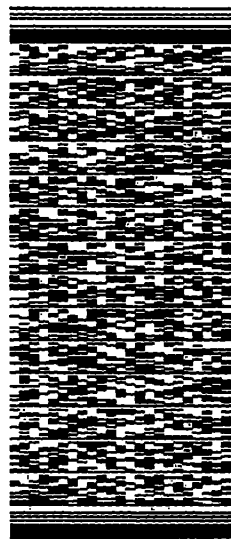


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Nicole Miller  
Federal Election Commission  
999 E ST NW

WASHINGTON, DC 20463



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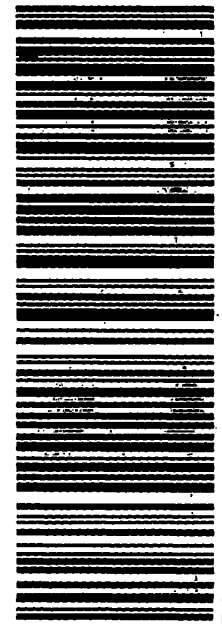
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Federal Election Commission  
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Shipping Date <b>1/22/14</b>	
Next Business Day Delivery <input checked="" type="checkbox"/>	
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<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked
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