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FEDERAL ELECTION
COMMISSION
MAIL ROOM

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BANK OF BOSTON

March 10, 1995

Mr. Stephen Cohen
Reports Analyst
Federal Election Commission
Washington, DC 20463

Dear Mr. Cohen:

In response to your recent letter to John Kahwaty, Treasurer of Bank of Boston Federal Political Action Committee, I would like to address your concerns regarding contributions to candidates disbursed after the November 8, 1994, election date. It is Bank of Boston's policy to report disbursements to candidates when the checks are cashed rather than issued. The reason behind this policy dates back to the prior general election of 1992, when it was then Bank of Boston's policy to report disbursements as of the check issue date. In 1992, The Federal Election Commission questioned our policy of reporting disbursements as of issue date, because several candidates were issued checks near the end of a reporting cycle and had not yet received the checks. As a result, Bank of Boston reported the disbursements, but the candidate did not, causing concern with the FEC. As a result, we changed our reporting of disbursements to its current policy, so that Bank of Boston and the candidates would report the disbursements in the same reporting cycle.

The current situation arose when three candidates where issued checks before general election, but did not cash the checks until after the election. Copies of the checks in question are attached for your review. It would greatly benefit all parties if the FEC would state definitively which method of reporting it would like us to use going forward.

If you have any questions, please feel free to call me at (617) 434-4311.

Sincerely,

Susan M Gruber

Susan M. Gruber
Manager, Domestic Accounting

cc: John Kahwaty w/enclosures

PBUS

No. 0531

5-39/110

November 4, 1994

PAY TO THE ORDER OF Maloney for Congress $ 250.00

Two Hundred Fifty and 00/100 ---------- DOLLARS

To THE FIRST
NATIONAL BANK OF BOSTON

BANK OF BOSTON CORPORATION
POLITICAL ACTION COMMITTEE

Peter J. Manning, Chairman

John A. Kahwaty, Treasurer

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No. 0527

5-39/110

October 4, 19 94

Pay to the Order of Re-elect Nancy Johnson to Congress $ 250.00

Two Hundred Fifty and 00/100 ---------- Dollars

To THE FIRST
NATIONAL BANK OF BOSTON

BANK OF BOSTON CORPORATION
POLITICAL ACTION COMMITTEE

Peter J. Manning, Chairman

John A. Kahwaty, Treasurer

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(203) 224-4866
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AS TO THE ORDER OF
FIRST CITY BANK
NEW BRITAIN, CT 06052
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FOR DEPOSIT ONLY
RE-ELECT NANCY JOHNSON
TO CONGRESS COMMITTEE
16003985 01

No. 0530

5-39/110

November 4, 1994

PAY TO THE ORDER OF John Comerford for Congress $ 250.00

Two Hundred Fifty and 00/100 ---------- DOLLARS

To THE FIRST
NATIONAL BANK OF BOSTON

BANK OF BOSTON CORPORATION
POLITICAL ACTION COMMITTEE

Peter J. Manning, Chairman

John A. Kahwaty, Treasurer

⑈000530⑈ ⑆011000390⑆509⑈3451⑈ ⑈0000025000⑈

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PAY TO THE ORDER OF
NATIONAL BANK

08 NOV 94

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⑆ PALM BEACH
NATIONAL BANK
& TRUST COMPANY
NORTH PALM BEACH,
FLORIDA
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Federal Election Commission

ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS

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

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JMH
PREPARER

3-16-95
DATE PREPARED

FEC FORM 70-2 (12/92)

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