



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

December 16, 1999

Gary W. Fields, Treasurer
American Bankers Association BankPAC
1120 Connecticut Avenue, NW, Suite 851
Washington, DC 20036

Identification Number: C00004275

Reference: September Monthly Report (8/1/99-8/31/99)

Dear Mr. Fields:

This letter is to inform you that as of December 15, 1999, the Commission has not received your response to our request for additional information, dated November 24, 1999. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

The Commission is in receipt of your letter on December 2, 1999; however, this does not address the matters in our letter referenced above. If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions regarding this matter, please contact Kenneth A. Davis, Jr. on our toll-free number (800) 424-9530 or our local number (202) 694-1130.

Sincerely,

A handwritten signature in black ink, appearing to read "John D. Gibson".

 John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Gary W. Fields, Treasurer
American Bankers Association BankPAC
1120 Connecticut Ave., NW, Suite 851
Washington, DC 20036

NOV 24 1999

Identification Number: C00004275

Reference: September Monthly Report (8/1/99-8/31/99)

Dear Mr. Fields:

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 A of your report discloses the receipt of funds from your connected organization (pertinent portion(s) attached). 2 U.S.C. §441b prohibits the receipt of funds from national banks, corporations, and labor organizations. Under 11 CFR §114.5(b)(3), however, a separate segregated fund may be reimbursed for any solicitation or other administrative expense provided that the reimbursement is made no later than thirty days after the expense was paid by the separate segregated fund.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. Please provide further clarifying information regarding the date(s) on which the committee made payments for any solicitation or other administrative expenses. To the extent that the reimbursement was made beyond thirty days, your committee must transfer the funds to an account not used to influence federal elections or refund the full amount to your connected organization in accordance with 11 CFR §103.3(b). The Commission recommends that you inform your connected organization in writing to provide them with the option of receiving a refund or granting written authorization of a transfer-out to protect the donor's interest.

Please inform the Commission of your corrective action immediately in writing and provide a copy of your check for the transfer-out or refund. In

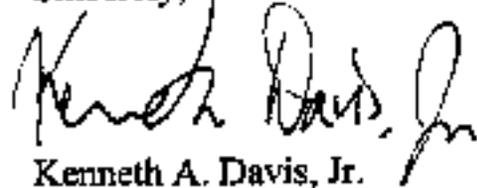
addition, any transfer-out or refund made should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the date on which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of a prohibited contribution, prompt action by your committee to refund or transfer-out the amount will be taken into consideration.

-Schedule A of your report discloses an aggregate year-to-date total(s) for a contribution(s) received from your connected organization which appears to be incorrect. Please amend your report to provide the correct aggregate year-to-date total(s).

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,



Kenneth A. Davis, Jr.

Reports Analyst

Reports Analysis Division

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary PagePAGE 1 OF 1
FOR LINE NUMBER
11(a)(5)

Contributions From Individuals (Itemized)

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)

ABA BankPac

Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
American Bankers Associat 1120 Conn. Ave. NW Washington, DC 20036	American Bankers Association Occupation Banker	8/12/99	\$2,494.74
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date \$ 11,066.25		
MD L.M. Baker	Wachovia Occupation Banker	8/24/99	\$500.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date \$ 700.00		
Stephen Christy PO Box 435 Lebanon, NE 68766	Mascoma Savings Bank Occupation Banker	8/10/99	\$250.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date \$ 250.00		
Robert E. Evans 1208 Glendale Road Marietta, OH 45750	Peoples Bank Occupation Banker	8/10/99	\$250.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date \$ 250.00		
Sherrad France P.O. Box 607 Rawlins, WY 82301	Bank of Commerce Occupation Banker	8/5/99	\$50.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date \$ 290.00		
Jerry Spencer 3449 Sunnyside Drive Montgomery, AL 36111	Alabama Bankers Assoc. Occupation Banker	8/12/99	\$200.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date \$ 220.00		
Robert Worth Norwest Bank Billings NA, 175 North 27th Street Billings, MT 59101	Norwest Bank Occupation Banker	8/4/99	\$250.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date \$ 270.00		
SUBTOTAL of Receipts This Page (optional)			\$ 3,994.74
TOTAL This Period (last page this line number only)			\$ 3,994.74

