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April 4, 2006

FEDERAL  
POLITICAL  
ACTION  
COMMITTEE

Mr. Matthew D. Smyth  
Vice President  
COMPAC  
900 Nineteenth Street NW, Suite 400  
Washington, DC 20006-2110

Dear Matthew:

We have been informed by the Federal Election Commission that the CBA Federal PAC's \$5,000 contribution (check number 1018), dated December 6, 2005, was in excess of the allowable contribution limit. The FEC has determined that the California Bankers Association, Connecticut Bankers Association, and Michigan Bankers Association, are affiliated and that each association's contribution to COMPAC is cumulative to the \$5,000 contribution limit (please see attached FEC memorandum, page 2, -Schedule B). Since COMPAC received the Connecticut Bankers and Michigan Bankers Associations contributions prior to the CBA Federal PAC contribution, we must ask COMPAC to reimburse our PAC the \$3,500 excess contribution.

Please submit a refund check, payable to the CBA Federal PAC, FEC #C00082324, in the amount of \$3,500. Our address is 1303 J Street, Suite 600, Sacramento, CA 95814. I have enclosed a reply envelope for your convenience.

If you have any questions, you may contact me at 916/438-4407 or [mboruff@calbankers.com](mailto:mboruff@calbankers.com). Thank you in advance for your prompt attention to this matter.

Sincerely,

Mary Boruff

Enclosures

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RQ-2



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

March 1, 2006

J. Richard Eichman, Treasurer  
California Bankers Association Federal  
(CALBANKPAC)  
1303 J Street Suite 600  
Sacramento, CA 95814

**Response Due Date:**  
**March 31, 2006**

Identification Number: C00082834

Reference: Year End Report (7/01/05 - 12/31/05)

Dear Mr. Eichman:

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. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Schedule A of your report discloses the receipt of funds from your connected organization totaling \$481.96. 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 after the expense was paid, you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited amount to an account not used to influence federal elections, and (2) provided written notice to your connected organization of the option of receiving a refund, you may retain

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the contribution in an account not used to influence federal elections. Any request from your connected organization for a refund must be honored.

If the foregoing conditions for transfers to a non-federal account were not met within 30 days of receipt, the prohibited amount must be refunded. See 11 CFR §103.3(b)(1).

Please inform the Commission of your corrective action immediately in writing and provide a copy of your check for any 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 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 from making contributions to another political committee and its affiliates 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 received on or before this date will be taken into

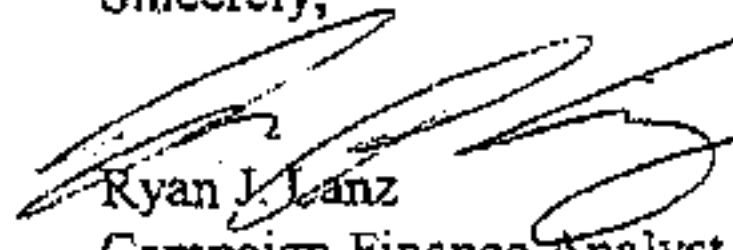
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consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure 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.

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) 694-1399.

Sincerely,



Ryan J. Lanz  
Campaign Finance Analyst  
Reports Analysis Division

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Recipient Name	Date	Amount	Report	Contributing Affiliate
America's Community Bankers Community Campaign Committee	3/02/05	\$500.00	2005 Mid-Year	Connecticut Bankers Association Political Action Committee (CBA FED PAC)
America's Community Bankers Community Campaign Committee	7/07/05	\$3,000.00	2005 Year End	Michigan Bankers Association - MIBANKPAC-FEDERAL
America's Community Bankers Community Campaign Committee	12/06/05	\$5,000.00	2005 Year End	California Bankers Association Federal (CALBANKPAC)

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Federal Election Commission  
**ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS**  
 The FEC added this page to the end of this filing to indicate how it was received.

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<input type="checkbox"/> Overnight Delivery Service (Specify):	Shipping Date
	Next Business Day Delivery <input type="checkbox"/>
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
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<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked

<i>Jm W</i> PREPARER	<i>4/12/06</i> DATE PREPARED
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