

OKLAHOMA BANKERS ASSOCIATION

P.O. Box 18246 • 643 N.E. 41st Street

Oklahoma City, OK 73154-0246

Phone: (405) 424-5252 • Fax: (405) 424-4518

RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM

Feb 20 9 12 AM '98

Celebrating 100 Years of Service

Oklahoma
Bankers
Association

oba

Planning for Your Future Is Our Future

February 19, 1998

Mr. Edward D. Ryan, Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, D. C. 20463

Roger M. Beverage
President and CEO

In re: **Mid-Year Report (1/1/97-6/30/97) for
Oklahoma Bankers Association Fed Elect PAC
FED Identification Number C00139477**

Dear Mr. Ryan:

This letter responds to a letter dated February 5, 1998, from Mr. John D. Gibson, Assistant Staff Director, Reports Analysis Division, Federal Election Commission, concerning the above-referenced report.

In his letter, Mr. Gibson indicated that OBA Fed Elect needed to provide "complete information regarding" CPAC, from whom a contribution of \$800 was received.

CPAC is a state political action committee registered with the Oklahoma Ethics Commission. No corporate funds or other funds prohibited by federal law and Federal Election Commission rules were included in the CPAC contribution, as Oklahoma state law closely parallels federal law in that regard. We believe, therefore, that the contribution was lawful.

However, as a matter of convenience and to assure compliance with the Federal Election Campaign Act and FEC rules, we have transferred the \$800 donation to a state political action committee affiliated with the Oklahoma Bankers Association.

The transfer will be reflected in our next report to the FEC.

Please let us know if this action is inappropriate, or if we need to take other steps. Thank you for your consideration and cooperation.

Sincerely,


Roger M. Beverage

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

1. NAME OF COMMITTEE (in full) ORA Fed Elect		2. FEC IDENTIFICATION NUMBER C00138477
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 643 N.E. 41st Street		
CITY, STATE and ZIP CODE Oklahoma City, OK 73105		3. <input checked="" type="checkbox"/> This committee has qualified as a multicandidate committee. (See FEC FORM 100)

4. TYPE OF REPORT

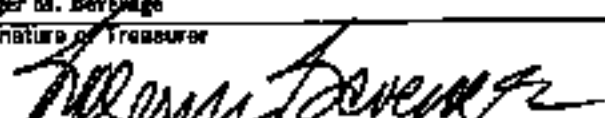
(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Termination Report

Monthly Report Due On:
 February 20 June 20 October 20
 March 20 July 20 November 20
 April 20 August 20 December 20
 May 20 September 20 January 31

Twelfth day report preceding _____
(Type of Election)
election on _____ in the State of _____

Thirtieth day report following the General Election on _____
in the State of _____

(b) Is this Report an Amendment? YES NO

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>01/01/97</u> through <u>06/30/97</u>		
6. (a) Cash on Hand January 1, 19 <u>97</u>		\$ 3,124.48
(b) Cash on Hand at Beginning of Reporting Period.....	\$ 3,224.48	
(c) Total Receipts (from line 19).....	\$ 13,232.89	\$ 13,232.99
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B).....	\$ 16,357.37	\$ 16,357.37
7. Total Disbursements (from Line 20).....	\$ 25.89	\$ 25.89
8. Cash on Hand at Close of Reporting Period (Subtract Line 7 from Line 6(d))..	\$ 16,331.48	\$ 16,331.48
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D).....	\$ 0.00	For further information: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-219-3420
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D).....	\$ 0.00	
I Certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and Complete		
Type or Print Name Of Treasurer Roger M. Beverage		
Signature of Treasurer 		Date 1-22-98

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 437g.

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FEC FORM 3X

(Revised 9/93)

DETAILED SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS

PAGE 2, FEC FORM 3X

Revised (1/1/91)

NAME OF COMMITTEE OBA Fed Elect

REPORT COVERING PERIOD

FROM: 01/01/97

TO: 06/30/97

	COLUMN A Total This Period	COLUMN B Calendar Year
I. Receipts		
11. Contributions (other than loans) From:		
a. Individual/Persons Other Than Political Committees		
i. Itemized (Use Schedule A).....	2,015.00	2,015.00
ii. Unitemized.....	10,240.00	10,240.00
iii. Total..... (add i and ii) >	12,255.00	12,255.00
b. Political Party Committees.....	0.00	0.00
c. Other Political Committees (such as PACs).....	800.00	800.00
d. Total Contributions..... (add aii, b and c) >	13,055.00	13,055.00
12. Transfers From Affiliated/Other Party Committees.....	0.00	0.00
13. All Loans Received.....	0.00	0.00
14. Loan Repayments Received.....	0.00	0.00
16. Offsets To Operating Expenditures (Refunds, Rebates, etc.).....	0.00	0.00
18. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0.00	0.00
17. Other Federal Receipts (Dividends, Interest, etc.).....	177.89	177.89
18. Transfers from Nonfederal Account for Joint Activity.....	0.00	0.00
19. Total Receipts..... (add 11d, 12, 13, 14, 15, 16, 17, and 18) >	13,232.89	13,232.89
20. Total Federal Receipts..... (subtract line 18 from line 19) >	13,232.89	13,232.89
II. Disbursements		
21. Operating Expenditures:		
a. Shared Federal/Non-Federal Activity (from Schedule H4)		
i. Federal Share.....	0.00	0.00
ii. Non-Federal Share.....	0.00	0.00
b. Other Federal Operating Expenditures.....	25.89	25.89
c. Total Operating Expenditures..... (Add a, ii, and b) >	25.89	25.89
22. Transfers to Affiliated/Other Party Committees.....	0.00	0.00
23. Contributions to Federal Candidates/Committees and Other Political Committees.....	0.00	0.00
24. Independent Expenditures (use Schedule E).....	0.00	0.00
25. Coordinated Expenditures Made by Party Committees (2 U.S.C. 4410(d)) (use Schedule F).....	0.00	0.00
26. Loan Repayments Made.....	0.00	0.00
27. Loans Made.....	0.00	0.00
28. Refunds of Contributions To:		
a. Individuals/Persons Other Than Political Committees.....	0.00	0.00
b. Political Party Committees.....	0.00	0.00
c. Other Political Committees (Such As PACs).....	0.00	0.00
d. Total Contribution Refunds..... (Add a, b, and c) >	0.00	0.00
29. Other Disbursements.....	0.00	0.00
30. Total Disbursements..... (Add 21c, 22, 23, 24, 25, 26, 27, 28d, and 29) >	25.89	25.89
31. Total Federal Disbursements..... (Subtract line 21 aii from line 30) >	25.89	25.89
III. Net Contributions/Operating Expenditures		
32. Total Contributions (Other than loans) (from line 11d).....	13,055.00	13,055.00
33. Total Contribution Refunds (from line 28d).....	0.00	0.00
34. Net Contributions (Other than loans) (subtract line 33 from 32).....	13,055.00	13,055.00
35. Total Federal Operating Expenditures..... (add 21 ai and 21 b) >	25.89	25.89
36. Offsets to Operating Expenditures (from line 15).....	0.00	0.00
37. Net Operating Expenditures..... (subtract line 36 from 35) >	25.89	25.89

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

The 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 or any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in full)
OBA Fed Elect

A. Full Name, Mailing Address and Zip Code PHILIP H. VILES JR. PO BOX 700414 TULSA, OK 74170-0414		Name of Employer RCB BANK	Date (Month day, Year) 02/21/97	Amount of Each Receipt this Period 500.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)		Occupation Aggregate Year-to-date > \$	500.00	
B. Full Name, Mailing Address and Zip Code Charles Hall PO BOX 797 PERRY, OK 73007-0797		Name of Employer EXCHANGE BANK & TRUST CO.	Date (Month day, Year) 05/12/97	Amount of Each Receipt this Period 15.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)		Occupation Aggregate Year-to-date > \$	215.00	
C. Full Name, Mailing Address and Zip Code WILLIAM RAPP JR. P.O. BOX 37 SHAWNEE, OK 74801		Name of Employer FIRST STATE BANK & TRUST CO.	Date (Month day, Year) 05/16/97	Amount of Each Receipt this Period 500.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)		Occupation BANKER Aggregate Year-to-date > \$	500.00	
D. Full Name, Mailing Address and Zip Code FRANCIS DAVIS W KENNEDY & INDEPENDENCE SHAWNEE, OK 74801		Name of Employer FIRST STATE BANK & TRUST CO.	Date (Month day, Year) 05/16/97	Amount of Each Receipt this Period 500.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)		Occupation BANKER Aggregate Year-to-date > \$	500.00	
E. Full Name, Mailing Address and Zip Code JOHN MASSEY PO BOX 130 DURANT, OK 74702-0130		Name of Employer DURANT BANK & TRUST CO.	Date (Month day, Year) 06/04/97	Amount of Each Receipt this Period 500.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)		Occupation BANKER Aggregate Year-to-date > \$	500.00	
F. Full Name, Mailing Address and Zip Code		Name of Employer	Date (Month day, Year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)		Occupation Aggregate Year-to-date > \$		
G. Full Name, Mailing Address and Zip Code		Name of Employer	Date (Month day, Year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)		Occupation Aggregate Year-to-date > \$		

SUB TOTAL of Receipts This Page (Optional).....> **2,015.00**

TOTAL this Period (Last page this line number only).....> **2,015.00**

SCHEDULE A

ITEMIZED RECEIPTS

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)
OBA Fed Elect

A. Full Name, Mailing Address and Zip Code CPAC P.O. BOX 951 CUSHING, OK 74023		Name of Employer Bank of Cushing	Date (Month day, Year) 01/27/97	Amount of Each Receipt this Period 800.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)		Occupation		Aggregate Year-to-date > \$ 800.00
B. Full Name, Mailing Address and Zip Code		Name of Employer	Date (Month day, Year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)		Occupation		Aggregate Year-to-date > \$
C. Full Name, Mailing Address and Zip Code		Name of Employer	Date (Month day, Year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)		Occupation		Aggregate Year-to-date > \$
D. Full Name, Mailing Address and Zip Code		Name of Employer	Date (Month day, Year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)		Occupation		Aggregate Year-to-date > \$
E. Full Name, Mailing Address and Zip Code		Name of Employer	Date (Month day, Year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)		Occupation		Aggregate Year-to-date > \$
F. Full Name, Mailing Address and Zip Code		Name of Employer	Date (Month day, Year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)		Occupation		Aggregate Year-to-date > \$
G. Full Name, Mailing Address and Zip Code		Name of Employer	Date (Month day, Year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (Specify)		Occupation		Aggregate Year-to-date > \$

SUB TOTAL of Receipts This Page (Optional).....>	800.00
TOTAL this Period (Last page this line number only).....>	800.00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

February 5, 1998

Roger M. Beverage, Treasurer
Oklahoma Bankers Association
Fed. Elect
643 NE, 41st Street
Oklahoma City, OK 73105

2/9/98
LAST URGENT!

Identification Number: C00139477

Reference: Mid-Year Report (1/1/97-6/30/97)

Dear Mr. Beverage:

On January 14, 1998, you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your January 23, 1998 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.

-Your amendment includes a Schedule A supporting Line 11(c); however, you still have not provided complete information regarding the donor committee. Please amend Schedule A to include the full name and correct committee address for the \$800 contribution received from "CPAC".

If this information is not received by the Commission 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 related to this matter, please contact Edward Ryan on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

LAS!

RQ-2

JAN 14 1998

Roger M. Beverage, Treasurer
Oklahoma Bankers Association
Fed. Elect
643 NE, 41st Street
Oklahoma City, OK 73105

RECEIVED
JAN 20 1998
OFFICE

Identification Number: C00139477

Reference: Mid-Year Report (1/1/97-6/30/97)

Dear Mr. Beverage:

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:

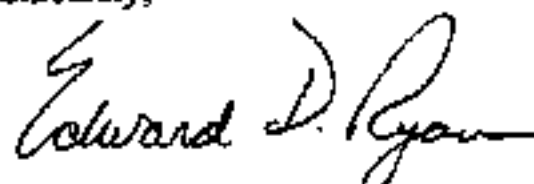
-Please amend Schedule A supporting Line 11(a)(i) (but should be on line 11(c)) by providing the full name and correct committee address for each contribution received from a political committee. 11 CFR §104.3(a)(4)(ii) and (iii)(B)

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Contributions from other political committees (such as PAC's) registered with the Commission should be properly disclosed on a separate Schedule A, supporting Line 11(c) of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

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) 219-3580.

Sincerely,

A handwritten signature in cursive script that reads "Edward D. Ryan". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

Edward D. Ryan
Reports Analyst
Reports Analysis Division

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.

<input checked="" type="checkbox"/> Hand Delivered	Date of Receipt 2/10/98
<input type="checkbox"/> First Class Mail	POSTMARKED
<input type="checkbox"/> Registered/Certified Mail	POSTMARKED
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> Received from the House office of Records and Registration	Date of Receipt
<input type="checkbox"/> Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/> Other (Specify):	Postmarked and/or Date of Receipt
<input type="checkbox"/> Electronic Filing	
 E.S.	 2/23/98
PREPARER	DATE PREPARED