



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

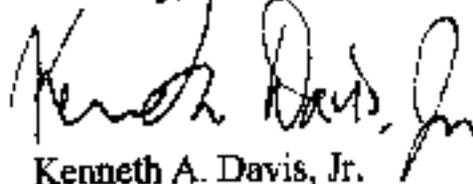
addition, any transfer-out or refund made should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the date on which the transaction was made.

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 Page

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 American Bankers Associat 1120 Conn. Ave. NW Washington, DC 20036	Name of Employer American Bankers Association Occupation Banker	Date (month, day, year) 8/12/99	Amount of Each Receipt this Period \$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		
Full Name, Mailing Address and ZIP Code L.M. Baker	Name of Employer Webcorla Occupation Banker	Date (month, day, year) 8/24/99	Amount of Each Receipt this Period \$500.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date \$ 700.00		
Full Name, Mailing Address and ZIP Code Stephen Christy PO Box 435 Lebanon, NH 03766	Name of Employer Masonia Savings Bank Occupation Banker	Date (month, day, year) 8/10/99	Amount of Each Receipt this Period \$250.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date \$ 250.00		
Full Name, Mailing Address and ZIP Code Robert E. Evans 1208 Glendale Road Marietta, OH 45750	Name of Employer Peoples Bank Occupation Banker	Date (month, day, year) 8/10/99	Amount of Each Receipt this Period \$250.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date \$ 250.00		
Full Name, Mailing Address and ZIP Code Sherrad France P.O. Box 607 Rawlins, WY 82301	Name of Employer Bank of Commerce Occupation Banker	Date (month, day, year) 8/5/99	Amount of Each Receipt this Period \$50.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date \$ 290.00		
Full Name, Mailing Address and ZIP Code Jerry Spencer 3449 Summerhill Drive Montgomery, AL 36111	Name of Employer Alabama Bankers Assoc. Occupation Banker	Date (month, day, year) 8/12/99	Amount of Each Receipt this Period \$200.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date \$ 220.00		
Full Name, Mailing Address and ZIP Code Robert Worth Norwest Bank Billings NA, 175 North 27th Street Billings, MT 59101	Name of Employer Norwest Bank Occupation Banker	Date (month, day, year) 8/4/99	Amount of Each Receipt this Period \$150.00
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

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