



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Roger M. Beverage, Treasurer  
Oklahoma Bankers Association Federal  
Political Action Committee  
643 NE 41<sup>st</sup> Street  
Oklahoma City, OK 73105

SEP 12 2001

Identification Number: C00139477

Reference: Year End Report (7/1/99-12/31/99)

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:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.1(d) preclude a committee and its affiliates from receiving contributions from another political committee or person in excess of \$5,000 per calendar year.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeded the limits, you must seek reattribution of the contribution pursuant to 11 CFR §110.1(k), transfer-out the amount in excess of \$5,000 to an account not used to influence federal elections or refund the excessive amount to the donor(s) in accordance with 11 CFR §103.3(b). In the best interest of your committee, all reattributions, transfers-out, and refunds should be made within sixty days of the treasurer's receipt of the contribution(s). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of granting written authorization for a reattribution or transfer-out to another account or receiving a refund.

Please inform the Commission of your corrective action immediately in

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writing and provide a photocopy of your check for the transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of \$5,000 and/or notify the recipient in writing of your redesignation of the contribution. In the best interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation 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. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

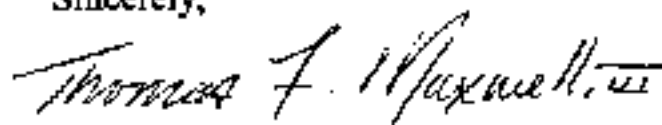
Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

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

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COMMITTEE  
PAGE 3

toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports  
Analysis Division). My local number is (202) 694-1130.

Sincerely,

A handwritten signature in cursive script that reads "Thomas F. Maxwell, III". The signature is written in dark ink and is positioned to the right of the word "Sincerely,".

Thomas F. Maxwell, III  
Reports Analyst  
Reports Analysis Division

<b>SCHEDULE A</b>	<b>ITEMIZED RECEIPTS</b>	Use separate schedule(s) for each category of the Detailed Summary Page	7 / 10
			FOR LINE NUMBER 11C

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)**  
**Oklahoma Bankers Federal PAC**

<b>Full Name, Mailing Address, and ZIP Code</b> ARVEST BANK GROUP INC PAC INC 125 WEST CENTRAL SUITE 218  BENTONVILLE AR 72712	<b>Name of Employer</b>  _____  <b>Occupation</b>  _____	<b>Date (month, day, year)</b> 07/30/1999	<b>Amount of Each Receipt this Period</b> 5000.00
RECEIPT FOR: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): _____		<b>Aggregate Year-to-Date</b> > \$ 5000.00	

Tff

<b>SUBTOTALS of Receipts This Page (Optional)</b> .....	
<b>TOTALS This Period (last page this line number only)</b> .....	<b>5000.00</b>

**SCHEDULE A**

**ITEMIZED RECEIPTS**

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

**Contributions From Other Political Committees (such as PACs)**

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**NAME OF COMMITTEE (In Full)**  
**ABA BankPac**

<b>Full Name, Mailing Address and ZIP Code</b> Arvest Bank PO Box 55500 Del City, OK 73155	<b>Name of Employer</b> _____	<b>Date (month, day, year)</b> 7/26/99	<b>Amount of Each Receipt this Period</b> \$5,000.00
	<b>Occupation</b> _____		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): _____	<b>Aggregate Year-to-Date</b> \$ 5,000.00		

TF??

<b>Full Name, Mailing Address and ZIP Code</b> CITPAC Joan David, CivitasBank Evansville, IN 47708-1200	<b>Name of Employer</b> CivitasBank	<b>Date (month, day, year)</b> 7/1/99	<b>Amount of Each Receipt this Period</b> \$2,000.00
	<b>Occupation</b> CIVITAS Political Action Committee		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify): _____	<b>Aggregate Year-to-Date</b> \$ 2,000.00		

<b>SUBTOTAL of Receipts This Page (optional)</b> .....	<b>\$ 7,000.00</b>
<b>TOTAL This Period (last page this line number only)</b> .....	<b>\$ 7,000.00</b>

**SCHEDULE B ITEMIZED DISBURSEMENTS**

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

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FOR LINE NUMBER  
23

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)**  
**Oklahoma Bankers Federal PAC**

Full Name, Mailing Address, and ZIP Code	Purpose of Disbursement (Senate - OK - 00) Campaign contribution	Date (month, day, year)	Amount of Each Disbursement This Period
JAMES M INHOFE 2129 E 32ND ST  TULSA OK 74105	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15/1999	1000.00
Full Name, Mailing Address, and ZIP Code WATKINS FOR CONGRESS BOX 999  STILLWATER OK 74078	Purpose of Disbursement (House - OK - 03) Campaign contribution	Date (month, day, year) 11/15/1999	Amount of Each Disbursement This Period 500.00
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		

TEFF

SUBTOTALS of Disbursements This Page (Optional) .....

TOTALS This Period (last page this line number only) .....

1500.00

**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

**Contributions to Federal Candidates/Committees**

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	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement this Period
Mike Thompson for Congress Primary 2000 PO Box 1998 St Helena, CA 94574	Contribution: Mike Thompson (CA-1-D) Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other: 2000	10/22/99	\$500.00
Pat Toomey for Congress Committee Primary 2000 PO Box 90158 Allentown, PA 18109	Contribution: Patrick Toomey (PA-15-R) Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other: 2000	10/12/99	\$1,000.00
Committee to Elect Nydia M Velazquez to Congress Primary 2000 3168 Decatur Avenue Bronx, NY 10467	Contribution: Nydia M. Velazquez (NY-12-D) Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other: 2000	10/21/99	\$1,500.00
Watkins for Congress Box WW Stillwater, OK 74076	Contribution: Wes Watkins (OK-3-R) Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other: 2000	10/4/99	\$3,000.00
Watkins for Congress Box WW Stillwater, OK 74076	Contribution: Wes Watkins (OK-3-R) Disbursement For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other: 2000	10/4/99	\$1,000.00

TPM

TPM

SUBTOTAL of Disbursements This Page (optional)	\$7,000.00
TOTAL This Period (last page this line number only)	\$76,500.00

SCHEDULE B ITEMIZED DISBURSEMENTS

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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

199-03-445-2289-541-50-56

Name/Address	Purpose of Disbursement	Date of Disbursement	Amount
Santorus 2000 PO Box 10495 Pittsburgh, PA 15234	Richard J Santorus REP-DELA-PA, 19992000 CYCLE  Disbursement for: Primary	03/30/1999	\$5,000.00
Sherman for Congress 5752 Sepulveda Blvd., Box 1906 Sherman Oaks, CA 91403	Brad Sherman SEN-24-CA, 19992000 CYCLE  Disbursement for: Primary	03/16/1999	\$1,500.00
Sue Kelly for Congress 87 Bedford Rd. Katonah, NY 10534	Sue Kelly REP-19-NY, 19992000 CYCLE  Disbursement for: Primary	03/15/1999	\$2,000.00
Tim Johnson for South Dakota P. O. Box 85113 Sioux Falls, SD 57105	Tim Johnson SEN-0-SD, 19971998 CYCLE  Disbursement for: Primary	03/12/1999	\$1,000.00
Wetkin for Congress Box 111 Stillwater, OK 74074	Wes Wetkin REP-5-OK, 19992000 CYCLE  Disbursement for: Primary	03/16/1999	\$1,000.00
Watts for Congress P.O. Box 720361 Norman, OK 73070	J.C. Watts REP-4-OK, 19992000 CYCLE  Disbursement for: Primary	03/08/1999	\$500.00

SUBTOTAL of Disbursements This Page (optional) \$11,000.00  
TOTAL This Period (last page this line number only) \$80,300.00



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