



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Howard Glaser, Esq., Treasurer
Mortgage Bankers Association of America
Political Action Committee
1919 Pennsylvania Avenue, NW
Washington, DC 20006

DEC 20 2000

Identification Number: C00004812

Reference: October Monthly Report (9/01/00-9/30/00)

Dear Mr. Glaser:

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) from an organization(s) which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. §§441a(f) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received impermissible funds, the Commission recommends that you transfer the impermissible funds to an account not used to

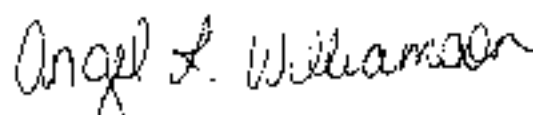
influence federal elections or refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR §103.3(b). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of receiving a refund or granting written authorization for a transfer to another account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts 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 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,



Angel L. Williamson
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 c

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)

Mortgage Bankers Association of America Political Action Committee

A. Full Name, Mailing Address and ZIP Code
Nebraska Mortgage Association PAC
 11606 Nicholas Street
 Suite 100
 Omaha, NE 68154

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this Period

09/06/00

4,000.00

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Aggregate Year-to-Date \$ 4,000.00

B. Full Name, Mailing Address and ZIP Code
Committee for Fairness in Govt Fund
 1900 Crestwood Blvd.
 Birmingham, AL 35210

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this Period

09/07/00

1,500.00

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Aggregate Year-to-Date \$ 1,500.00

C. Full Name, Mailing Address and ZIP Code
Bank of America Corp. PAC
 NC1-002-23-78
 101 South Tryon St.
 Charlotte, NC 28255

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this Period

09/07/00

5,000.00

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Aggregate Year-to-Date \$ 5,000.00

D. Full Name, Mailing Address and ZIP Code
First Union Corp. Employees Good Govt Fund
 One First Union Center
 Charlotte, NC 28288

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this Period

09/21/00

2,750.00

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Occupation
Treasurer

Aggregate Year-to-Date \$ 2,750.00

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

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

Occupation

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

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

Occupation

Receipt For: ☐ Primary ☐ General
☐ Other (specify):

Aggregate Year-to-Date \$

SUBTOTAL of Receipts This Page (optional)

13,250.00

TOTAL This Period (last page this line number only)

13,250.00

