



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

RQ-2

MAR - 5 1997

William E. Cumberland, Treasurer
Mortgage Bankers Association of America
Political Action Committee
1125 15th Street NW, Suite 700
Washington, DC 20005

Identification Number: C00004812

Reference: October Monthly Report (9/1/96-9/30/96)

Dear Mr. Cumberland:

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:

-Line 23 of the Detailed Summary Page of your report discloses a total of \$20,600 in contributions to federal candidates/committees and other political committees. The sum of the entries itemized on Schedule B, however, indicates the total to be \$25,100. Please amend your report to clarify the discrepancy.

-Your calculations for Lines 21(b), Columns A and B through 31, Columns A and B appear to be incorrect. FEC calculations disclose this amount to be \$25,261.50 and \$146,926.69, respectively. Please provide the corrected totals on the Detailed Summary Page.

-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 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

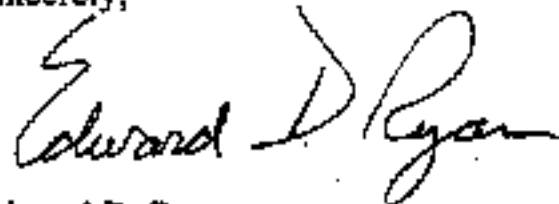
recipient in writing of your redesignation of the contribution. In the best interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the candidate(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 §110.2(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 toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

A handwritten signature in dark ink, appearing to read "Edward D. Ryan". The signature is fluid and cursive, with a large initial "E" and "R".

Edward D. Ryan
Reports Analyst
Reports Analysis Division

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary PagePAGE 1 OF 3
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)

Mortgage Bankers Association of America Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Waller for Congress 320 First St. SE Washington, DC 20003	Contribution Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	9/11/96	2,000.00 502
B. Full Name, Mailing Address and ZIP Code Roger Bedford '96 2361 Fairlane Drive Montgomery, AL 36116	Contribution Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	9/12/96	1,000.00
C. Full Name, Mailing Address and ZIP Code Wynston Bryant for Senate c/o 430 S. Capitol St. SE Washington, DC 20003	Contribution Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	9/19/96	2,000.00
D. Full Name, Mailing Address and ZIP Code Rochester Community Savings Bank Political Action Committee c/o 2812 Emerywood Pkwy. Richmond, VA 23294-3744	Contribution Disbursement for: ☐ Primary ☐ General ☒ Other (specify) PAC TO PAC	9/19/96	3,500.00
E. Full Name, Mailing Address and ZIP Code LaRocco for Congress 1125 17th St. S. Arlington, VA 22206	Contribution Disbursement for: ☐ Primary ☐ General ☒ Other (specify) Debt	9/20/96	300.00
F. Full Name, Mailing Address and ZIP Code Bereuter for Congress 4010 Franconia Rd. Alexandria, VA 22310-2136	Contribution Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	9/20/96	500.00
G. Full Name, Mailing Address and ZIP Code Re-elect Joe Moakley, Cmte. P.O. Box 1073 Boston, MA 02205-9832	Contribution Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	9/20/96	1,000.00
H. Full Name, Mailing Address and ZIP Code Ken Calvert for Congress Cmte. 4451 Brookfield Corporate Dr. Chantilly, VA 20151-1652	Contribution Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	9/20/96	500.00
I. Full Name, Mailing Address and ZIP Code Ackerman for Congress P.O. Box 95 Fresh Meadows, NY 11365	Contribution Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	9/20/96	500.00

SUBTOTAL of Disbursements This Page (optional)

11,300.00

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s)
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Detailed Summary PagePAGE 1 OF 1
FOR LINE NUMBER
23

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NAME OF COMMITTEE (in Full)

MORTGAGE BANKERS ASSOCIATION OF AMERICA POLITICAL ACTION COMMITTEE

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
Weller for Congress 4451 Brookfield Corporate Drive Chantilly, VA 22021-1652	Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	10/11/95	\$3,000.00 SDR
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

\$3,000.00

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary PagePAGE 1 OF 1
FOR LINE NUMBER
23

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NAME OF COMMITTEE (in Full)

Mortgage Bankers Association of America Political Action Committee

A. Full Name, Mailing Address and ZIP Code National Republican Campaign Comm. 320 First Street, SE Washington, DC 20003	Purpose of Disbursement Contribution Disbursement for: ☐ Primary ☐ General ☒ Other (specify) dues	Date (month, day, year) 3/7/95	Amount of Each Disbursement This Period 15,000.00
B. Full Name, Mailing Address and ZIP Code Friends for Stade Gorton 11027 NE 4th Bellevue, WA 98004	Purpose of Disbursement Contribution Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 3/8/95	Amount of Each Disbursement This Period 1,000.00
C. Full Name, Mailing Address and ZIP Code Jon Christensen for Congress PO Box 540621 Omaha, NE 68154-0621	Purpose of Disbursement Contribution Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 3/13/95	Amount of Each Disbursement This Period 1,000.00
D. Full Name, Mailing Address and ZIP Code Weller for U.S. Congress P.O. Box 687 Morris, IL 60450	Purpose of Disbursement Contribution Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) 3/23/95	Amount of Each Disbursement This Period 500.00 SDR
E. Full Name, Mailing Address and ZIP Code Robb for Senate 2420 Davis Avenue Alexandria, VA 22302	Purpose of Disbursement Contribution Disbursement for: ☐ Primary ☐ General ☒ Other (specify)	Date (month, day, year) 3/30/95	Amount of Each Disbursement This Period 1,000.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

GRAND TOTAL of Disbursements This Page (optional)

GRAND TOTAL This Period (last page this line number only)

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