



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Gary W. Fields, Treasurer
American Bankers Association BankPAC
1120 Conn. Ave., NW Suite 851
Washington, DC 20036

MAR 31 1999

Identification Number: C00004275

Reference: Year End Report (11/24/98-12/31/98)

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 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.

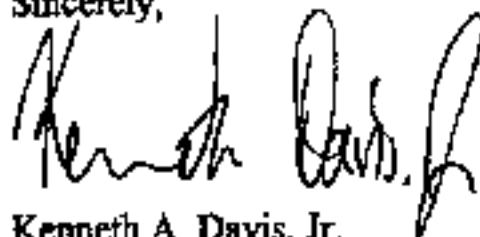
If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of \$5,000 and/or notify the recipient 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 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 toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth A. Davis, Jr.", written in a cursive style.

Kenneth A. Davis, Jr.
Reports Analyst
Reports Analysis Division

SCHEDULE B ITEMIZED DISBURSEMENTS

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Line 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) ABA BankPac

Name/Address	Purpose of Disbursement	Date of Disbursement	Amount
Abraham for Senate 31750 Telegraph Rd. Ste. 205 Bingham Farms, MI 48025	Edmond S Abraham REP-SENA-MI, 19992000 CYCLE Disbursement for: Primary	12/15/1998	\$2,000.00
Fitzgerald for Senate, Inc 50 North Broadway St Suite 4-5 Palestine, IL 60064	Peter Fitzgerald REP-SENA-IL, 19971998 CYCLE Disbursement for: Debt (Primary)	12/01/1998	\$5,000.00
Friends of Connie Mack 1211 N. Westshore Blvd. Suite 315 Tampa, FL 33607	Connie Mack REP-SENA-FL, 19992000 CYCLE Disbursement for: Primary	12/01/1998	\$5,000.00
Frist 2000 Inc. 4205 Hillsboro Road, Suite 306 Nashville, TN 37215	Bill Frist REP-SENA-TN, 19992000 CYCLE Disbursement for: Primary	12/01/1998	\$5,000.00
Georgians for Isakson 6065 Roswell Road Atlanta, GA 30309	John H Isakson REP-6-GA, 19992000 CYCLE Disbursement for: Special	12/07/1998	\$1,000.00
Georgians for Isakson 6065 Roswell Road Atlanta, GA 30309	John H Isakson REP-6-GA, 19992000 CYCLE Disbursement for: Special	12/01/1998	\$1,000.00
Inlee for Congress 218 Main Street STE 195 Kirkland, WA 98033	Jay Inlee DEM-1-WA, 19971998 CYCLE Disbursement for: Debt (General)	12/30/1998	\$1,000.00
Judy Biggart for Congress PO Box 637 Winnetka, IL 60092	Judy Biggart REP-13-IL, 19971998 CYCLE Disbursement for: Debt (General)	12/24/1998	\$2,000.00
Ken Benson for Congress 5615 Morningside #101 Houston, TX 77005	Ken Benson DEM-25-TX, 19971998 CYCLE Disbursement for: Debt (General)	12/21/1998	\$1,000.00

SUBTOTAL of Disbursements this Page (optional)

\$23,000.00

SCHEDULE B ITEMIZED DISBURSEMENTS

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NAME OF COMMITTEE (in full) ABA BankPac

Name/Address	Purpose of Disbursement	Date of Disbursement	Amount
Ellen Taucher for Congress	Ellen Taucher DEN-10-CA, 19971998 CYCLE Disbursement for: Primary	07/18/1997	\$1,000.00
Ewing for Congress 301 W. Mill Street Purdue, IL 61764	Tom Ewing REP-15-IL, 19971998 CYCLE Disbursement for: Primary	07/07/1997	\$1,500.00
Fossella for Congress	Vito Fossella REP-13-NY, 19971998 CYCLE Disbursement for: Primary	07/17/1997	\$1,000.00
Frist 2000 Inc. 4205 Hillsboro Road, Suite 306 Nashville, TN 37215	Bill Frist REP-SENA-TN, 19992000 CYCLE Disbursement for: Primary	07/09/1997	\$4,800.00
Karen McCarthy For Congress 1311 Valentine Road Kansas City, MO 64111	Karen McCarthy DEN-5-MO, 19971998 CYCLE Disbursement for: Primary	07/17/1997	\$500.00
Lazio for Congress '98	Rick Lazio REP-2-NY, 19971998 CYCLE Disbursement for: Primary	07/17/1997	\$4,000.00
Luther For Congress Volunteer Committee 4009 Tenth Avenue North Anoka, MN 55303	William P Luther DEN-6-MN, 19971998 CYCLE Disbursement for: Primary	07/11/1997	\$1,000.00
Martin Frost Congressional	Martin Frost DEN-24-TX, 19971998 CYCLE Disbursement for: Primary	07/18/1997	\$2,500.00
Mike Crapo for Congress Committee 1177 West State Street Boise, ID 83702	Michael D Crapo REP-2-ID, 19971998 CYCLE Disbursement for: Primary	07/09/1997	\$2,500.00

SUBTOTAL of Disbursements This Page (optional)

\$18,000.00

SCHEDULE B ITEMIZED DISBURSEMENTS

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NAME OF COMMITTEE (In Full) ABA BankPac

Name/Address	Purpose of Disbursement	Date of Disbursement	Amount
Congressman Joe Barton Committee P. O. Box 1444 Ennis, TX 75119	Joe Barton REP-S-TX, 19971998 CYCLE Disbursement for: Primary	02/26/1997	\$1,000.00
Deinhunt For Congress Committee 560 Victory Road Quincy, MA 02171	William Deinhunt DEM-10-MA, 19951996 CYCLE General Disbursement for: Debt	02/05/1997	\$1,000.00
Retirement			
Democratic Congressional Campaign Committee 430 South Capitol St., SE Washington, DC 20003	Democratic Congressional Campaign Committee 1997 CYCLE Disbursement for: Annual	02/21/1997	\$15,000.00
Contribution			
Frist 2000 Inc. 4205 Hillsboro Road, Suite 306 Nashville, TN 37215	Bill Frist REP-SEN-MN, 19992000 CYCLE Disbursement for: Primary	02/10/1997	\$1,000.00
40 Gene Taylor for Congress P. O. Box 2639 Bay St Louis, MS 39520	Gene Taylor DEM-S-MS, 19951996 CYCLE General Disbursement for: Debt	02/03/1997	\$1,000.00
Retirement			
Kind for Congress 595 King Street, Suite D10 LaCrosse, WI 54601	Ron Kind DEM-3-WI, 19951996 CYCLE General Disbursement for: Debt	02/14/1997	\$500.00
Retirement			
LeTourrette For Congress Committee 35401 Euclid Ave. #215 Willoughby, OH 44094	Steven C LeTourrette REP-19-OH, 19951996 CYCLE General Disbursement for: Debt	02/03/1997	\$1,000.00
Retirement			
Missourians For Kix Bond 1998 911 Main St., Suite 1702 Kansas City, MO 64105	Christopher S Bond REP-SEN-MO, 19971998 CYCLE Disbursement for: Primary	02/07/1997	\$1,000.00
NRCC Congressional Forum 320 1st St., S.E. Washington, DC	NRCC Congressional Forum DC, 1997 CYCLE Disbursement for: Annual	02/14/1997	\$15,000.00
Contribution			

SUBTOTAL of Disbursements This Page (optional)

\$36,500.00

