



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

TO: THE COMMISSION
STAFF DIRECTOR
GENERAL COUNSEL
FEC PRESS OFFICE
FEC PUBLIC RECORDS

FROM: COMMISSION SECRETARY *MWD*

DATE: August 25, 2003

SUBJECT: COMMENTS: DRAFT AO 2003-22

Transmitted herewith are timely submitted comments from the following:

Terry G. Greisinger, Vice President, Public Affairs
Michigan Bankers Association (MiBank PAC);

Max Cook, President, Missouri Bankers Association;

George Beattie, President, Nebraska Bankers
Association.

Proposed Advisory Opinion 2003-22 is on the agenda for Thursday, August 28, 2003.

Attachment:

3 pages



MICHIGAN BANKERS ASSOCIATION

222 North Washington Square, Suite 320 ♦ Lansing, Michigan 48933

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www.mibankers.com ♦ E-mail: mba@mibankers.com

FEDERAL ELECTION
COMMISSION
SECRETARIAT

DENNIS R. KOONS, President & Chief Executive Officer

2003 AUG 25 P 12: 53

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OFFICE OF GENERAL
COUNSEL

2003 AUG 25 A 10: 38

August 14, 2003

Mr. Lawrence H. Norton, Esq.
General Counsel
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

VIA FACSIMILE (202) 219-3923

RE: Advisory Opinion Request 2003-22

Dear Mr. Norton:

The Michigan Bankers Association (MBA) would like to express our support for the American Bankers Associations (ABA) Advisory Opinion Request 2003-22. The MBA represents 191 commercial banks and savings banks in Michigan. The MBA maintains both federal and state Political Action Committees.

It is extremely pertinent that executives of our corporate members be permitted to collect and forward contributions for trade association PACs. We therefore strongly urge the FEC to confirm AOR 2003-22.

Thank you for your attention to this matter.

Sincerely,

Terry G. Greisinger
Vice President – Public Affairs
MiBankPAC Treasurer

DISTRIBUTE

BT

VIA FACSIMILE (202) 219-3923

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Missouri Bankers Association

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COUNSEL

August 21, 2003

Lawrence H. Norton, Esq.
General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

RE: AOR 2003-22

Dear Mr. Norton:

I am writing in regard to AOR 2003-22, which was submitted by the American Bankers Association. My understanding is the FEC is currently scheduled to vote on this request on August 28.

The Missouri Bankers Association strongly supports AOR 2003-22, and I urge the FEC to confirm that executives of our corporate members are permitted to collect and forward contributions to our trade association PACs.

Thank you for your consideration of this matter.

Sincerely,

Max Cook
President

MC/cl

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233 South 13th Street, Suite 1100
Lincoln, Nebraska 68508
Phone: (402) 474-1555
Fax: (402) 474-2946
www.nebankers.org

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NBA Nebraska Bankers Association

August 18, 2003

Lawrence H. Norton, Esq.
General Counsel
Federal Election Commission
999 E Street NW
Washington, D.C. 20463

RE: AOR 2003-22

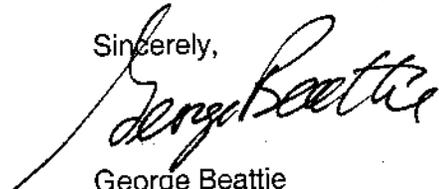
Dear Mr. Norton:

I write on behalf of the Nebraska Bankers Association (NBA) in support of Advisory Opinion Request 2003-22. The NBA is a trade association representing 268 of the 270 commercial banks and eight savings and loans in the state of Nebraska.

It is our understanding that the American Bankers Association has submitted this Advisory Opinion Request seeking clarification regarding the ability of executives of member corporations to collect and forward contributions for trade association PACs. We would encourage the Federal Election Commission (FEC) in responding to this Advisory Opinion Request to confirm that executives of corporate members are permitted to collect and forward contributions for trade association PACs.

We believe that the effect of the conciliation agreements referenced in the Advisory Opinion Request has resulted in an overly restrictive limitation on the ability of member corporations to solicit and facilitate contributions on behalf of their trade association's PAC. Subject to the limitations described by the ABA in its Advisory Opinion Request and as further clarified by the ultimate advisory opinion to be issued by the FEC, we would encourage the FEC to rule affirmatively in clarifying the ability of member corporations to solicit and facilitate contributions on behalf of their trade association's PAC.

Sincerely,


George Beattie
President
george.beattie@nebankers.org

/smi

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