



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 912

Date Filmed 4/27/79 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

March 29, 1979

Bryan K. Koontz, Executive Director
Wisconsin Bankers Association
16 North Carroll Street
Madison, Wisconsin 53703

Re: MUR 912

Dear Mr. Koontz:

After considering the circumstances of this matter, the Commission has determined to take no further action against you and close its file in this matter.

In taking this action, the Commission reminds you that your contribution was nevertheless in violation of 2 U.S.C. §441b and that civil penalties may be assessed in such matters. In August, 1978, the Commission determined that even if such contributions are refunded, civil penalties would be assessed against violators after that date.

If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter, at (202) 523-4175.

Sincerely,

William C. Oldaker
General Counsel



79040121524

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Wisconsin Bankers Association) MUR 912

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on March 27, 1979, the Commission determined by a vote of 6-0 to adopt the following recommendations, as set forth in the General Counsel's Report dated March 20, 1979, regarding the above-captioned matter:

1. Take no further action against the Wisconsin Bankers Association.
2. Close the file.
3. Send the letter attached to the above-named report.

Attest:

3/28/79

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Signed by General Counsel: 3-21-79
Received in Office of Commission Secretary: 3-23-79, 12:16
Circulated on 48 hour vote basis: 3-23-79, 4:30

79040121525

March 23, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 912

Please have the attached General Counsel's Report on MUR 912 distributed to the Commission on a 48 hour tally basis.

Thank you.

79040121526

BEFORE THE FEDERAL ELECTION COMMISSION
March 20, 1979

79 MAR 23 P12: 16

In the Matter of)
)
Wisconsin Bankers) MUR 912
Association)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

79040121527
A review of the April 10, 1978 Quarterly Report filed by the Wisconsin Bankers Political Action Committee (the "Committee") revealed a \$1,000 loan from the Wisconsin Bankers Association (the "Association") which appeared to be a contribution from a corporation in violation of 2 U.S.C. §441b(a). Reports Analysis Division notified the Committee of the surface violation on August 11, 1978, and the Committee submitted a response on August 24, 1978. In that response, the Committee stated that in addition to the first \$1,000 loan, another loan for \$1,000 was received from the Association on April 4, 1978. The Committee further stated that on June 29, 1978, both loans were repaid to the Association with a 6 1/2% interest rate charged on the total of \$2,000.

The matter was then referred to the General Counsel's Office. On March 1, 1979, the Commission determined to take no further action against the Committee and to find reason to believe the Association violated 2 U.S.C. §441b(a). A letter was sent to the Association on March 6, 1979.

II. NEW EVIDENCE

On March 5, 1979, Bryan Koontz, Executive Director of the Association, hand delivered a written response to the Commission and requested a meeting to discuss the matter. This meeting took place on March 16, 1979 between two members of this office and Mr. Koontz and another associate representing the Association.

As stated in the attached response (see Attachment 1), Mr. Koontz explained that because the Association has corporate power to loan money and the Committee has authority to borrow, there was no thought given to the idea that these loans might be improper. Mr. Koontz pointed out that the money had been returned when the Association had learned that such transactions were illegal, which was prior to the Commission's original notification to the Committee.

Mr. Koontz and his associate gave assurances that such an incident will not occur in the future and that they will be taking steps to have such a prohibition written into their by-laws. A copy of their revised by-laws will be sent to the Commission.

ANALYSIS

The Commission's policy has been not to proceed beyond the reason to believe stage in connection with pre-August, 1978 corporate contributions which have been refunded. Here, the contributions in question were pre-August, 1978 and were refunded even prior to the Commission's first notification to the recipient Committee. Given these factors, plus the Association's stated efforts to correct the matter, the Office of General Counsel

79040121528

recommends that no further action should be taken against the Association.

IV. RECOMMENDATION

1. Take no further action against the Wisconsin Bankers Association; close the file.
2. Send the attached letter.

3/21/79
Date

William C. Oldaker
General Counsel

ATTACHMENTS

1. Response
2. Proposed letter

79040121529



**WISCONSIN
BANKERS
ASSOCIATION**

Executive Director
Bryan K. Koontz

Associate Directors
Christopher Damon
Michael Lomperski
Ronald Mulvaney

Assistant to the
Director
Dawn Jensen
Rena Lang

Ms. Marybeth Tarrant
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

RE: MUR 912

Dear Ms. Tarrant:

The Wisconsin Bankers Association ("WBA") has received a letter dated March 6, and signed by Mr. Charles N. Steele, Associate General Counsel, for Mr. William C. Oldaker, General Counsel, of the Federal Election Commission ("Commission"). This letter requests facts and arguments concerning 2 loans made by WBA to the Wisconsin Bankers Political Action Committee ("Wisbankpac") during 1978, and directs that such responses be referred to you.

Both of these loans were extended as a courtesy to Wisbankpac by WBA at Wisbankpac's request, with neither WBA nor Wisbankpac being aware that they were improper. The loans were requested at a point when a Wisbankpac campaign was being planned, and thus early repayment was assumed (i.e., there was no expectation, understanding or belief on WBA's part - or on Wisbankpac's - that WBA was making a "contribution" to Wisbankpac - it was intended solely as a true loan.) The question of whether or not the loans were proper simply did not arise, since WBA has corporate power to loan money and Wisbankpac had authority to borrow money. It seemed more convenient to borrow the money from WBA than to borrow it from a bank, and this is what was done.

WBA first became aware that there might be a problem with the loans during a seminar on lobbying and campaign financing laws sponsored by the State Bar of Wisconsin. As soon as we became aware of it, WBA requested repayment of the loans, and this was done, together with interest accrued, on June 29, 1978. Sometime thereafter (August 13, 1978), Wisbankpac received a letter of inquiry from the Commission concerning the loans and their possible impropriety, and suggesting that they be returned as a refund of contribution. Wisbankpac Treasurer Francis Krause responded on August 24, 1978, explaining the circumstances under which the loans were requested, and that they had been repaid on June 29, 1978. In his letter, Mr. Krause asked that if Wisbankpac's reporting was not the proper way of disclosing the handling of the loans and repayments, the Commission advise him of the proper manner. Since the July reports showing the repayment had already been filed, it seemed unnecessary to amend the filing since the Commission did not request Wisbankpac to do so.

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COMMISSION

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March 13, 1979

Attachment 1

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Ms. Marybeth Tarrant
March 13, 1979
Page Two

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Mr. Steele's letter asked that WBA provide any facts or arguments we might have as to why action should not be taken against WBA. We feel that action is both unnecessary and unwarranted, since compliance is the objective of the Federal Election Law. As indicated, both WBA and Wisbankpac were unaware that the loans were improper; they were certainly not intended to be contributions in fact. Both were openly disclosed in Wisbankpac's regular reports filed with the Commission. As soon as we became aware that they might be improper, they were corrected through repayment with full interest. The repayment was also fully and openly disclosed, and Wisbankpac, with WBA's involvement, sought to be informed of the correct procedure to rectify the problem, in the event the reporting procedure used was not adequate.

Neither WBA nor Wisbankpac wishes to be in violation of the law. Both organizations have sought steadfastly to comply with the law, and the Commission's rules and interpretations. Unfortunately, in these two instances, the question of propriety simply did not come up, since the loans were never envisioned by WBA or Wisbankpac as "contributions."

Wisbankpac, at WBA's suggestion, has been very conscientious in its operating procedures and, we believe, has fully complied with both the letter and the spirit of the law and the Commission's guidelines. Wisbankpac reports far more contributions than it is by law required to report, and has set full disclosure as its goal. Its reports are timely and thorough; we have had few follow-up requests for information or clarification from the Commission.

Thus, WBA feels that action is unwarranted because there was not a "knowing and willful" violation of the law; the loans were made under an ignorance of their impropriety - an ignorance evidenced by the full reporting of the transactions. When we became aware of the problem, the loans were immediately repaid. While we are well aware that ignorance of the law is not an excuse, there was no intent to violate the law; in fact, both WBA and Wisbankpac have had a stated and demonstrated intent to operate totally within the law, shying away even from borderline cases.

We also believe that, since the Commission has repeatedly emphasized that compliance is its objective, action against WBA is unnecessary. Not only have the loans been repaid - and of course no further loans been made - but we have taken internal steps within WBA to insure that no similar transaction should again occur. The whole incident has been discussed with WBA's Executive Council (governing body) and a policy adopted which prohibits any such loans. Should the Commission wish, such a policy

Ms. Marybeth Tarrant
March 13, 1979
Page Three

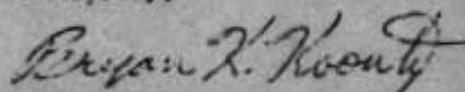
can be formalized in the Association's minutes, and/or incorporated in the Association's by-laws (which are presently undergoing revision). A similar statement could, I am sure, be adopted by Wisbankpac's Board of Directors.

In addition, even by last summer, we had instituted a legal review process within WBA which serves to provide a cross-check on Wisbankpac operations - as well as WBA's relationship with them - because of the difficulties with these loans. We are satisfied that these mechanisms will prevent any further instances of non-compliance. Hence, WBA is in no way attempting to circumvent the Commission or contest its approach; we are conscientiously attempting to comply with the law and the Commission's regulations and interpretations.

I trust that this letter will appropriately respond to Mr. Steele's inquiries, and that it will satisfy any concerns the Commission might have about WBA's willingness to comply with the Federal Election Campaign Act and the Commission's regulations and interpretations. A mistake was made; it was willingly corrected - even before Commission notification - and openly disclosed and reported. We have taken steps to insure that it does not happen again, and have further instituted procedures to attempt to insure that no similarly unintentional violations occur in any other aspect or area of compliance. We are willing to take further corrective or protective steps should the Commission see fit. Hence, we submit that further action by the Commission against WBA is both unwarranted and unnecessary to secure compliance with the Federal Election Campaign Act.

If I can provide any additional information, please do not hesitate to contact me.

Sincerely,



Bryan K. Koontz
Executive Director

BKK:de

Attachment 2



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

Bryan K. Koontz, Executive Director
Wisconsin Bankers Association
16 North Carroll Street
Madison, Wisconsin 53703

Re: MUR 912

Dear Mr. Koontz:

After considering the circumstances of this matter, the Commission has determined to take no further action against you and close its file in this matter.

In taking this action, the Commission reminds you that your contribution was nevertheless in violation of 2 U.S.C. §441b and that civil penalties may be assessed in such matters. In August, 1978, the Commission determined that even if such contributions are refunded, civil penalties would be assessed against violators after that date.

If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter, at (202) 523-4175.

Sincerely,

William C. Oldaker
General Counsel



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MURPHY, STOLPER, BREWSTER & HORTON S. C.
LAWYERS

RECEIVED
FEDERAL ELECTION
COMMISSION

NATIONAL GUARDIAN LIFE BUILDING
2 EAST GILMAN STREET
MAILING ADDRESS P. O. BOX 2036
MADISON, WISCONSIN 53701
(608) 257-7151

MAR 23 PM 1:07

21 March 1979

ROBERT B. L. MURPHY
WARREN H. STOLPER
F. ANTHONY BREWSTER
WM. PHARIS HORTON
JOHN RASHKE
WILLIAM F. MUNDT
MICHAEL R. VAUGHAN
RICHARD W. FITZNER
LAWRENCE S. SEUFERER

A. J. GRIFFIN III
JOSEPH F. OWENS
RICHARD Z. KABAKER
RALPH M. CALE
FRED GANTS
JOSEPH W. BOUCHER
WALTER L. HARVEY
OF COUNSEL
JOHN P. DESMOND

Ms. Marybeth Tarrant
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Dear Marybeth:

On behalf of the Wisconsin Bankers Association, I'd like to thank you for meeting with Bryan Koontz and me last Friday to discuss our "loan" problem. We both appreciate the time you and Les spent with us in reviewing the matter.

Since our return to Madison, the Wisconsin Bankers PAC treasurer has forwarded a copy of Charles Steele's letter of March 6 to him, informing him that the Commission determined to take no further action against the PAC. Needless to say, we hope the outcome will prove to be the same for the Association.

If I may provide any further information, please do not hesitate to contact me. I'm likely to be in Washington again at the end of April and, if so, will call to check our status at that time.

Sincerely yours,
Mike Vaughan
Michael R. Vaughan

MRV:pls

79040121534

MURPHY, STOLPER, BREWSTER & DESMOND, S. C.

LAWYERS

NATIONAL GUARDIAN LIFE BUILDING

P. O. Box 2038

MADISON, WISCONSIN 53701



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Ms. Marybeth Tarrant
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

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March 13, 1979

WISCONSIN BANKERS ASSOCIATION

Executive Director
Bryan K. Koontz

Associate Directors
Christopher Damon
Michael Lompanski
Ronald Mulvaney

Ms. Marybeth Tarrant
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

901624

RE: MUR 912

Assistant to the
Director
Dawn Jensen
Reema Lang

Dear Ms. Tarrant:

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Ms. Marybeth Tarrant
March 13, 1979
Page Two

79040121537

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Neither WBA nor Wisbankpac wishes to be in violation of the law. Both organizations have sought steadfastly to comply with the law, and the Commission's rules and interpretations. Unfortunately, in these two instances, the question of propriety simply did not come up, since the loans were never envisioned by WBA or Wisbankpac as "contributions."

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Thus, WBA feels that action is unwarranted because there was not a "knowing and willful" violation of the law; the loans were made under an ignorance of their impropriety - an ignorance evidenced by the full reporting of the transactions. When we became aware of the problem, the loans were immediately repaid. While we are well aware that ignorance of the law is not an excuse, there was no intent to violate the law; in fact, both WBA and Wisbankpac have had a stated and demonstrated intent to operate totally within the law, shying away even from borderline cases.

We also believe that, since the Commission has repeatedly emphasized that compliance is its objective, action against WBA is unnecessary. Not only have the loans been repaid - and of course no further loans been made - but we have taken internal steps within WBA to insure that no similar transaction should again occur. The whole incident has been discussed with WBA's Executive Council (governing body) and a policy adopted which prohibits any such loans. Should the Commission wish, such a policy

Ms. Marybeth Tarrant
March 13, 1979
Page Three

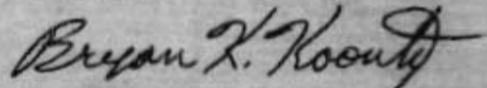
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Sincerely,



Bryan K. Koontz
Executive Director

BKK:de

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WISCONSIN
BANKERS
ASSOCIATION

140 NORTH CARROLL STREET
MADISON, WISCONSIN 53702

19 FEB 3 11

**RETURN RECEIPT
REQUESTED**

CERTIFIED
No. 070889
MAIL



Ms. Marybeth Tarrant
Federal Election Commission
1325 K Street, N.W.
WASHINGTON, D. C. 20463



**WISCONSIN
BANKERS
ASSOCIATION**

Executive Director
Bryan K. Koontz

Associate Directors
Christopher Damon
Michael Lomperski
Ronald Mulvaney

Assistant to the
Director
Dawn Jansen
Roma Lang

Ms. Marybeth Tarrant
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

RE: NJR 912

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March 13, 1979

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Ms. Marybeth Tarrant
March 13, 1979
Page Two

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March 13, 1979
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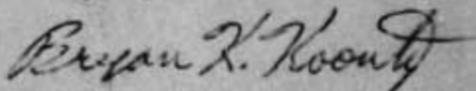
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If I can provide any additional information, please do not hesitate to contact me.

Sincerely,



Bryan K. Koontz
Executive Director

BKK:de



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

March 6, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Wisconsin Bankers Political Action
Committee
Frank A. Krause, Treasurer
P.O. Box 96
Waterloo, WI 53594

RE: MUR 912

Dear Mr. Krause:

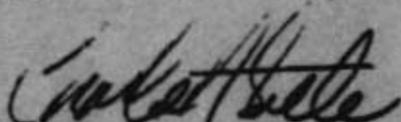
On March 1, 1979, the Commission determined to take no further action against your committee in connection with your acceptance of contributions (see 2 U.S.C. §431(e)(1) for the definition of a contribution) from a corporation, the Wisconsin Bankers Association, in violation of 2. U.S.C. §441b(a). The Commission made this determination based on the fact that your committee refunded the illegal contributions on June 29, 1978; however, the Commission notified all candidates and committees in August, 1978, that in the future, the Commission would not only require that all corporate and union contributions be refunded, but that civil penalties would be assessed against the contributor and recipient of such contributions.

Should you have any questions regarding this matter, please call Marybeth Tarrant at 202/523-4175.

Sincerely,

William C. Oldaker
General Counsel

BY:


Charles N. Steele
Associate General Counsel



79040121543

79040121544

MUR 912 - Tenant

PS Form 3811, Apr 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

SENDER Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
- Show to whom and date delivered..... c
 - Show to whom, date, and address of delivery..... c
 - RESTRICTED DELIVERY
Show to whom and date delivered..... c
 - RESTRICTED DELIVERY
Show to whom, date, and address of delivery. \$.....
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO
*Whomcom Bookers Political Assoc.
Frank A. Krause*

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. | INSURED NO.
 | *438223* |

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE Addressee Authorized agent

4. DATE OF DELIVERY
5/1/79



5. ADDRESS/Complete only if requested

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS
5/1/79



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

March 6, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

President
Wisconsin Bankers Association
16 North Carroll Street
Madison, WI 53703

RE: MUR 912

Dear Sir or Madame:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that the Wisconsin Bankers Association may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, it appears that your organization violated 2 U.S.C. §441b(a) by contributing \$2000 to the Wisconsin Bankers Political Action Committee. Section 431(e)(1) of the Act includes loan within the definition of a contribution. Although we note that the Committee returned these contributions to you on June 29, 1978, the Act was violated when the contributions were made. We have numbered this matter MUR 912.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter, at 202/523-4175.

79040121545

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

BY:

Charles N. Steele
Charles N. Steele
Associate General Counsel

790401 1546 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MUR 912 - Tenant

SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one):
 Show to whom and date delivered c
 Show to whom, date, and address of delivery c
 RESTRICTED DELIVERY Show to whom and date delivered c
 RESTRICTED DELIVERY Show to whom, date, and address of delivery c (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
President Wisconsin Bank Assoc

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
438224

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE Addressee Authorized agent
y. Beale

4. DATE OF DELIVERY
3/9/79

5. ADDRESS: Complete only if requested

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

POSTMARK
 MAR 9 1979

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Wisconsin Bankers Political)
Action Committee)
Waterloo, Wisconsin)
)
Wisconsin Bankers Association,)
Madison, Wisconsin)

MUR 912

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, certify that on March 1, 1979, the Commission determined by a vote of 6-0 to adopt the recommendation of the General Counsel to take the following actions in the above-captioned matter:

1. Take no further action against the Wisconsin Bankers Political Action Committee and send the draft letter attached to the General Counsel's Report dated February 2, 1979.
2. Find reason to believe that the Wisconsin Bankers Association violated 2 U.S.C. §441b(a) in connection with contributions to Wisconsin Bankers Political Action Committee, and send the draft letter attached to the General Counsel's Report dated February 2, 1979.

Attest:

3/2/79

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

79040121547



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *MWE*
DATE: FEBRUARY 7, 1979
SUBJECT: OBJECTION - MUR 912 - First General Counsel's
Report dated 2-2-79; Received in
OCS Friday, 2-2-79, 5:06

The above-named document was circulated on a 48
hour vote basis at 12:00, Monday, February 5, 1979.

Commissioner Harris submitted an objection at
10:57, February 7, 1979, thereby placing the matter
on the Executive Session Agenda for February 15, 1979.

79040121548

February 2, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 912

Please have the attached First General Counsel's Report on MUR 912 distributed to the Commission on a 48 hour tally basis.

Thank you.

79040121549

FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO COMMISSION FEB 2 1979

MUR NO. 79 FEB 29 12 5: 06
STAFF MEMBER(S) _____

Tarrant

SOURCE OF MUR: INTERNALLY GENERATED
RESPONDENT'S NAME: Wisconsin Bankers Political Action Committee
Waterloo, Wisconsin
Wisconsin Bankers Association, Madison, Wisconsin
RELEVANT STATUTE: 2 U.S.C. §441b(a)

INTERNAL REPORTS CHECKED: Public Records

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

A review of the April 10, 1978, Quarterly Report filed by the Wisconsin Bankers Political Action Committee (the "Committee") revealed a \$1000 loan from the Wisconsin Bankers Association (the "Association"), Madison, Wisconsin, which appeared to be a contribution from a corporation in violation of 2 U.S.C. §441b(a). This matter was referred to the Office of General Counsel from the Reports Analysis Division on January 17, 1979 (Attachment I).

EVIDENCE

The Committee was notified of the surface violation on August 11, 1978, and submitted a response on August 24, 1978. In that response the Committee stated that in addition to the first \$1000 loan, another loan for \$1000 was received from the Association on April 4, 1978. The Committee further stated that on June 29, 1978, as indicated on their July 10 Quarterly Report, both loans were repaid to the Association with a 6 1/2% interest rate charged on the total of \$2000. The Association has not yet been notified by the Commission of the violation.

79040121550

PRELIMINARY ANALYSIS

2 U.S.C. §431(e)(1) provides that a loan is considered a contribution. 2 U.S.C. §441b(a) renders it unlawful for a corporation to make a contribution in connection with any federal election. Thus, the Act was violated when the Association, which is incorporated, loaned the Committee money.

The Commission, on July 26, 1978, discussed the subject of civil penalties in connection with violations of 2 U.S.C. §441b which prohibits corporate contributions. Based on the Commission's decision, all candidates and committees were notified in August, 1978, that in the future, the Commission would not only require that corporate contributions be refunded, but that civil penalties would be assessed against the contributor and recipient of such contributions. Due to the fact that this matter deals with corporate contributions prior to August, 1978, which have been refunded, it appears that no further action should be taken against the Committee; however, the Commission should find reason to believe that the Association violated 2 U.S.C. §441b(a).

RECOMMENDATION

1. Take no further action against the Wisconsin Bankers Political Action Committee. Send attached letter.
2. Find reason to believe that the Wisconsin Bankers Association violated 2 U.S.C. §441b(a) in connection with contributions to Wisconsin Bankers Political Action Committee. Send attached letter.

Attachments

1. Referral from Reports Analysis
2. Proposed letter to Wisconsin Bankers Political Action Committee
3. Proposed letter to Wisconsin Bankers Association

7904012151

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

MUR 912

DATE January 17, 1979

ANALYST Mark Kleinman MK

TO: William Oldaker

TEAM CHIEF Steve Hims SM

THROUGH: STAFF DIRECTOR OBP

COMPLIANCE REVIEW Carroll Bowen CB

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS JH

CANDIDATE/COMMITTEE: WISCONSIN BANKERS POLITICAL ACTION COMMITTEE (WISBANKPAC)

TREASURER: Frank A. Krause

ADDRESS: P.O. Box 96
Waterloo, WI 53594

AFFILIATE(S): None

ALLEGATION(S): Committee has received corporate contribution.

CITE: 2 U.S.C. 441b

ATTACHMENT(S) 02

MANNER IN WHICH REVIEW WAS INITIATED if other than normal review, AND DATE: 8-11-78

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 1-1-78 TO 3-31-78

TOTAL RECEIPTS \$ 1,000 TOTAL EXPENDITURES \$ 2,250

CASH ON HAND \$ 25 DEBTS \$ 0

HISTORY:

RESULTS OF REVIEW: 1st Notice surface violation for receipt of corporate contribution sent August 11, 1978. ATTACHMENT #3
Response to surface violation letter August 24, 1978 indicates contributions(loans) were repaid. #4

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: None ATTACHMENT

REASON(S) FOR REFERRAL: Corporate contributions received by the committee exceeds the threshold for review by General Counsel. ATTACHMENT

OTHER PENDING ACTIONS INITIATED BY RAD: None ATTACHMENT

OTHER RELEVANT INFORMATION: Corporate contributions(loans) were spent on contributions to State candidates and Operating expenditures. #5

Previous Referrals: Additional contribution(loan) reported on subsequent report(July 10 Quarterly Report), which was repaid on same report. #6

None

79040121553

ATTACHMENT #1

7 9 0 4 0 1 2 1 5 5 4

ALL REPORTS HAVE BEEN REVIEWED INCLUSIVE OF APRIL 10 QUARTERLY REPORT 1978

DATE 18DEC78
PAGE 1

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERED DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
WISCONSIN BANKERS POLITICAL ACTION COMMITTEE CONNECTED ORGANIZATION: BANKERS ASSOCIATION/WISCONSIN	1977 STATEMENT OF ORGANIZATION - AMENDMENT					14APR77	1	77FEC/052/1623
	1978 MISCELLANEOUS TRANSACTION TO F.E.C.					28AUG78	9	78FEC/083/4416
	1977 APRIL 10 QUARTERLY	150		3,547			6	77FEC/052/1624
	JULY 10 QUARTERLY	0		1,710			6	77FEC/056/3005
	OCTOBER 10 QUARTERLY	1,120		3,160		1APR77 - 30SEP77	10	77FEC/039/2818
	REQUEST FOR ADDITIONAL INFORMATION					1APR77 - 30SEP77	3	78FEC/096/1765
	OCTOBER 10 QUARTERLY - AMENDMENT	1,120		1,450		1APR77 - 30SEP77	7	78FEC/066/4592
	OCTOBER 10 QUARTERLY - AMENDMENT	1,120		1,450		1APR77 - 30SEP77	8	78FEC/098/0750
	YEAR END REPORT	0		2,300		30SEP77 - 31DEC77	5	78FEC/036/4577
	1978 APRIL 10 QUARTERLY	1,000		2,250		1JAN78 - 31MAR78	7	78FEC/070/1569
10 DAY PRE-PRIMARY	9,040		13,431		1JUL78 - 28AUG78	23	78FEC/084/2303	
REQUEST FOR ADDITIONAL INFO 2ND					1APR78 - 30APR78	3	78FEC/082/3149	
JULY 10 QUARTERLY	11,425		5,041		1APR78 - 30JUN78	19	78FEC/080/1933	
REQUEST FOR ADDITIONAL INFORMATION					1APR78 - 30JUN78	3	78FEC/096/1768	
JULY 10 QUARTERLY - AMENDMENT	11,425		5,041		1APR78 - 30JUN78	8	78FEC/098/0742	
OCTOBER 10 QUARTERLY	6,450		4,450		28AUG78 - 30SEP78	14	78FEC/087/1179	
OCTOBER 10 QUARTERLY - AMENDMENT					28AUG78	3	78FEC/089/4471	
10 DAY PRE-GENERAL	10,751		8,070		10CT78 - 23OCT78	16	78FEC/094/7379	
30 DAY POST-GENERAL	5,265		1,059		24OCT78 - 27NOV78	12	78FEC/099/1758	
TOTAL	45,201	0	43,308	0		163	TOTAL PAGES	

Have not been reviewed

79040121556

ATTACHMENT #2

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3

Page 3 of _____ for

Line Number 17a

(Use Separate Schedules for
each numbered line)

1978
Election Commission
Street, N.W.
ington, D.C. 20463

Name of Candidate or Committee in Full
Wisconsin Bankers Political Action Committee ("Wisbankpac")

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Wisconsin Bankers Association 16 North Carroll Street Madison, Wisconsin 53703	Occupation	2/17/78	\$1,000.00
Receipt for: 9-21-10 <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$ 1,000.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		
SUBTOTAL of receipts this page (optional)			\$
TOTAL this period (last page this line number only)			\$ 1,000.00

7 970930347001125157

79040121558

ATTACHMENT #3



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

8/26
9/11

August 11, 1978

Francis A. Krause, Treasurer
Wisconsin Bankers Political
Action Committee
P.O. Box 96
Waterloo, Wisconsin 53594

Dear Mr. Krause:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. During review of the April 10 Quarterly Report of Receipts and Expenditures, we noticed an entry indicating that you may have accepted a contribution from a corporation. Corporate contributions are prohibited by the Act, unless the contribution is made by a separate segregated fund established by the corporation. A copy of that portion of your report is attached for your review and clarification.

The Commission recommends that if you have accepted a prohibited contribution that you return the full amount to the donor. The return of the contribution should be reported immediately by letter and should be reflected as a contribution refund on your next report of receipts and expenditures. If the identification of the source of this contribution is incomplete or incorrect on the original report, please submit a statement which would clarify this particular matter for the public record. You may do so by amending your original report by letter.

Please notify the Commission within fifteen (15) days from the date of this letter of the determination made on this matter. If you have any questions concerning this matter, please do not hesitate to contact Mark Kleinman (800)424-9530, our Reports Analyst assigned to you. Our local telephone number is 523-4048.

Sincerely,

Orlando B. Potter
Staff Director

Enclosure
Certified Mail:
Return Receipt Requested

79040121559

79040121560

ATTACHMENT #4

August '78. 1007820 AM 9:54

Mr. Orlando B. Potter
Staff Director
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

805722

Dear Mr. Potter:

This letter is in reply to your correspondence of August 11, 1978 regarding your review of the Wisbankpac April 10 Quarterly Report of Receipts and Expenditures.

As was stated on the April 10 Report, the money received from the Wisconsin Bankers Association was a loan to Wisbankpac, due to the fact that the Wisbankpac funds were depleted at that time, and therefore, a loan was requested from W.B.A. On our July 10 Report, it was stated that a second loan was requested by Wisbankpac from W.B.A. on April 4, 1978, as the funds were again depleted. On June 29, 1978, as indicated on the July 10 Report, both loans were repaid to W.B.A. with a 6 1/2 % interest rate charged on the total of \$2,000.00. We have enclosed a copy of our July 10 Report which indicates the repayment of the loans.

If the loans and loan repayments were not reported correctly on the reports and/or listed under the wrong section, please inform us of the correct way in which they should have been reported, and we will be happy to submit amended reports.

We hope this clarifies any questions raised by the Commission. We are very sorry for the delay in replying to you, however, I was on vacation and did not review it until August 22.

If you have any further questions, please do not hesitate to let us know, and we will be happy to assist you.

Sincerely,

F. A. Krause
Francis A. Krause
Treasurer

Enclosure

7 8 9 0 4 3 6 2 1 5 6 1

79040121562

ATTACHMENT #5

ED
1978
lection Commission
reet, N.W.
n, D.C. 20403

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind,
Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c
of FEC FORM 3

Page 5 of for
Line Number 22B

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

APRIL 10 QUARTERLY Q1-78

Wisconsin Bankers Political Action Committee ("Wisbankpac")

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Citizens for Keppler	Campaign Fund	3/6/78	\$100.00
	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Citizens to Re-elect Hanke	Campaign Fund	3/6/78	\$100.00
	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Citizens for Pabst	Campaign Fund	3/6/78	\$100.00
	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Citizens for Plewa	Campaign Fund	3/6/78	\$100.00
	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Committee to Re-elect Robert E. Behnke	Campaign Fund	3/10/78	\$100.00
	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Friends of Steven Brist	Campaign Fund	3/10/78	\$100.00
	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (optional).....			\$ 600.00
TOTAL this period (last page this line number only).....			\$ 2,250.00

79040121563

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

78030001955
79040121564

Name of Candidate or Committee in Full			
Wisconsin Bankers Political Action Committee ("Wisbankpac")			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Friends of Flintrop	Campaign Fund	6/15/78	\$100.00
	Expenditure for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Friends of Chet Gerlach	Campaign Fund	6/16/78	\$200.00
	Expenditure for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Citizens for John Plewa	Campaign Fund	6/29/78	\$200.00
	Expenditure for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Wisconsin Bankers Association 16 North Carroll Street Madison, Wisconsin 53703	Administration Expense	6/12/78	\$277.00
	Expenditure for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Wisconsin Bankers Association 16 North Carroll Street Madison, Wisconsin 53703	Repayment of Loans (6 1/2% interest)	6/29/78	\$2,039.36
	Expenditure for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (optional).....			\$ 2,816.36
TOTAL this period (last page this line number only).....			\$ 5,041.36

DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 13
 of FEC FORM 3

(Use Separate Schedules for
 each numbered line)

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full

Wisconsin Bankers Political Action Committee ("Wisbankpac")

Full Name, Mailing Address and ZIP Code of Debtor or Creditor

Wisconsin Bankers Association
 16 North Carroll Street
 Madison, Wisconsin 53703

Date (month,
 day, year)

4/4/78

Amount of Original
 Debt, Contract,
 Agreement or
 Promise

\$1,000.00

Cumulative
 Payment
 To Date

\$2,039.36

Outstanding
 Balance at
 Close of
 This Period

None

Primary General Other

NATURE OF OBLIGATION (Details of Debt):

Full Name, Mailing Address and ZIP Code of Debtor or Creditor

Date (month,
 day, year)

Amount of Original
 Debt, Contract,
 Agreement or
 Promise

Cumulative
 Payment
 To Date

Outstanding
 Balance at
 Close of
 This Period

Primary General Other

NATURE OF OBLIGATION (Details of Debt):

Full Name, Mailing Address and ZIP Code of Debtor or Creditor

Date (month,
 day, year)

Amount of Original
 Debt, Contract,
 Agreement or
 Promise

Cumulative
 Payment
 To Date

Outstanding
 Balance at
 Close of
 This Period

Primary General Other

NATURE OF OBLIGATION (Details of Debt):

SUBTOTALS this period this page (optional)

\$

\$

\$

TOTAL this period (last page this line number only)

\$1,000.00

\$2,039.36

\$ None

Carry outstanding balance only to appropriate line of summary.

79040121565
 78030001956
 78030001956

79040121566

ATTACHMENT #6

Other Income, Loans, Refunds)
 Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
 of FEC FORM 3

(Use Separate Schedules for
 each numbered line)

Name of Candidate or Committee in Full
 Wisconsin Bankers Political Action Committee (Wisbankpac)

7
9
0
4
0
1
2
1
5
6
7

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Rec. this Period
Wisconsin Bankers Association 16 North Carroll Street Madison, Wisconsin 53703 9-21-10	Occupation	4/4/78	\$1,000.00
Receipt for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$ 2,000.00		
Friends of Ron Parys returned \$500 of \$600 contribution - due to law stating candidates cannot exceed certain amount of contributions in	Occupation	5/26/78	\$500.00
Receipt for: campaign year <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		
(See Schedule 1A Attached)	Occupation	(see attached)	9,925.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		
SUBTOTAL of receipts this page (optional)			\$
TOTAL this period (last page this line number only)			\$ 11,425.00

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions in-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

(Use Separate Schedules for
 each numbered line)

7 9 0 3 0 4 0 1 2 1 5 6 9

Name of Candidate or Committee in Full			
Wisconsin Bankers Political Action Committee ("Wisbankpac")			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Friends of Flintrop	Campaign Fund	6/15/78	\$100.00
	Expenditure for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Friends of Chet Gerlach	Campaign Fund	6/16/78	\$200.00
	Expenditure for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Citizens for John Plewa	Campaign Fund	6/29/78	\$200.00
	Expenditure for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Wisconsin Bankers Association 16 North Carroll Street Madison, Wisconsin 53703	Administration Expense	6/12/78	\$277.00
	Expenditure for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Wisconsin Bankers Association 16 North Carroll Street Madison, Wisconsin 53703	Repayment of Loans (6 1/2% interest)	6/29/78	\$2,039.36
	Expenditure for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (optional)			\$ 2,816.36
TOTAL this period (last page this line number only)			\$ 5,041.36

Name of Candidate and Committee in Full
Wisconsin Bankers Political Action Committee ("Wisbankpac")

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Wisconsin Bankers Association 16 North Carroll Street Madison, Wisconsin 53703	4/4/78	\$1,000.00	\$2,039.36	None
<input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other				

NATURE OF OBLIGATION (Details of Debt):

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
		\$	\$	\$
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				

NATURE OF OBLIGATION (Details of Debt):

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
		\$	\$	\$
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				

NATURE OF OBLIGATION (Details of Debt):

SUBTOTALS (this period this page (optional)	\$	\$	\$
TOTAL (this period (first page this line number only)	\$ 1,000.00	\$ 2,039.36	\$ None

Carry outstanding balance only to appropriate line of summary.

7190044001201569

Attachment 2



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Wisconsin Bankers Political Action
Committee
Frank A. Krause, Treasurer
P.O. Box 96
Waterloo, WI 53594

RE: MUR 912

Dear Mr. Krause:

On February , 1979, the Commission determined to take no further action against your committee in connection with your acceptance of contributions (see 2 U.S.C. §431(e)(1) for the definition of a contribution) from a corporation, the Wisconsin Bankers Association, in violation of 2. U.S.C. §441b(a). The Commission made this determination based on the fact that your committee refunded the illegal contributions on June 29, 1978; however, the Commission notified all candidates and committees in August, 1978, that in the future, the Commission would not only require that all corporate and union contributions be refunded, but that civil penalties would be assessed against the contributor and recipient of such contributions.

Should you have any questions regarding this matter, please call Marybeth Tarrant at 202/523-4529.

Sincerely,

William C. Oldaker
General Counsel



79040121570



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

President
Wisconsin Bankers Association
16 North Carroll Street
Madison, WI 53703

RE: MUR 912

Dear Sir or Madame:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that the Wisconsin Bankers Association may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, it appears that your organization violated 2 U.S.C. §441b(a) by contributing \$2000 to the Wisconsin Bankers Political Action Committee. Section 431(e)(1) of the Act includes loan within the definition of a contribution. Although we note that the Committee returned these contributions to you on June 29, 1978, the Act was violated when the contributions were made. We have numbered this matter MUR 912.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Marybeth Tarrant, the staff member assigned to this matter, at 202/523-4529.

79040121571

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

79040121570

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

MUR 912

DATE January 17, 1979

ANALYST Mark Kleinman MK

TO: William Oldaker

TEAM CHIEF Steve Mims SM

THROUGH: STAFF DIRECTOR OBP.

COMPLIANCE REVIEW Carroll Bowen CB

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS JH

CANDIDATE/COMMITTEE: WISCONSIN BANKERS POLITICAL ACTION COMMITTEE (WISBANKPAC)

TREASURER: Frank A. Krause

ADDRESS: P.O. Box 96
Waterloo, WI 53594

AFFILIATE(S): None

ALLEGATION(S): Committee has received corporate contribution. CITE: 2 U.S.C. 441b

ATTACHMENT(S) #2

MANNER IN WHICH REVIEW WAS INITIATED if other than normal review, AND DATE: 8-11-78
ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 1-1-78 TO 3-31-78

TOTAL RECEIPTS \$ 1,000 TOTAL EXPENDITURES \$ 2,250

CASH ON HAND \$ 25 DEBTS \$ 0

HISTORY:

RESULTS OF REVIEW: 1st Notice surface violation for receipt of corporate contribution sent August 11, 1978. ATTACHMENT #3
Response to surface violation letter August 24, 1978 indicates contributions(loans) were repaid. #4

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: None ATTACHMENT

REASON(S) FOR REFERRAL: Corporate contributions received by the committee exceeds the threshold for review by General Counsel. ATTACHMENT

OTHER PENDING ACTIONS INITIATED BY RAD: None ATTACHMENT

OTHER RELEVANT INFORMATION: Corporate contributions(loans) were spent on contributions to State candidates and Operating expenditures. #5

Previous Referrals: Additional contribution (loan) reported on subsequent report (July 10 Quarterly Report), which was repaid on same report. #6

None

79040121574

ATTACHMENT #1

ALL REPORTS HAVE BEEN REVIEWED INCLUSIVE OF APRIL 10 QUARTERLY REPORT 1978

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)DATE 18DEC78
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
WISCONSIN BANKERS POLITICAL ACTION COMMITTEE								
CONNECTED ORGANIZATION: BANKERS ASSOCIATION/WISCONSIN								
	1977 STATEMENT OF ORGANIZATION- AMENDMENT					14APR77	1	77FEC/052/1623
	1978 MISCELLANEOUS TRANSACTION TO F.E.C.					28AUG78	9	78FEC/083/4416
	1977 APRIL 10 QUARTERLY	150		3,547			6	77FEC/052/1624
	JULY 10 QUARTERLY	0		1,710			6	77FEC/056/3005
	OCTOBER 10 QUARTERLY	1,120		3,160		1APR77 -30SEP77	10	77FEC/059/2818
	REQUEST FOR ADDITIONAL INFORMATION					1APR77 -30SEP77	3	78FEC/096/1765
	OCTOBER 10 QUARTERLY - AMENDMENT	1,120		1,450		1APR77 -30SEP77	7	78FEC/066/4582
	OCTOBER 10 QUARTERLY - AMENDMENT	1,120		1,450		1APR77 -30SEP77	8	78FEC/098/0750
	YEAR END REPORT	0		2,300		30SEP77 -31DEC77	5	78FEC/066/4577
	1978 APRIL 10 QUARTERLY	1,000		2,250		1JAN78 -31MAR78	7	78FEC/070/1569
	10 DAY PRE-PRIMARY	9,040		13,431		1JUL78 -28AUG78	23	78FEC/084/2503
	REQUEST FOR ADDITIONAL INFO 2ND					1APR78 -30APR78	3	78FEC/082/3149
	JULY 10 QUARTERLY	11,425		5,041		1APR78 -30JUN78	19	78FEC/080/1938
	REQUEST FOR ADDITIONAL INFORMATION					1APR78 -30JUN78	3	78FEC/096/1760
	JULY 10 QUARTERLY - AMENDMENT	11,425		5,041		1APR78 -30JUN78	8	78FEC/098/0742
	OCTOBER 10 QUARTERLY	6,450		4,450		28AUG78 -30SEP78	14	78FEC/087/1179
	OCTOBER 10 QUARTERLY - AMENDMENT					28AUG78	3	78FEC/089/4471
	10 DAY PRE-GENERAL	10,751		8,070		1OCT78 -23OCT78	16	78FEC/094/2379
	30 DAY POST-GENERAL	5,265		1,059		24OCT78 -27NOV78	12	78FEC/099/1758
	TOTAL	45,201	0	43,308	0		163	TOTAL PAGES

Have
not
been
reviewed

ID# C00048181

79040121576

FEDERAL ELECTION COMMISSION

DATE 12/18/78

COMMITTEE INDEX OF CANDIDATES SUPPORTED - (D) (77-78)

PAGE 1

COMMITTEE	CANDIDATE SUPPORTED	OFFICE	STATE	DISTRICT	CONTRIBUTIONS TO	EXPENDITURES ON BEHALF OF	ID#
-----------	---------------------	--------	-------	----------	------------------	---------------------------	-----

WISCONSIN BANKERS POLITICAL ACTION COMMITTEE
 CONNECTED ORGANIZATION: BANKERS ASSOCIATION#WISCONSIN

QUALIFIED

C00048181

KASTEN, ROBERT W. JR.	HOUSE	WI	09		1,200	0	H6WI09039
MULVANEY, RON		WI	09		500	0	H6WI09035
SENSENBRENNER, F. JAMES JR.		WI	09		500	0	H6WI09050
TOTAL					2,200	0	

79040121577

ATTACHMENT #2

A
1978
Election Commission
K Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3

Page 3 of for
Line Number 17a

(Use Separate Schedules for
each numbered line)

7 8 9 10 11 12 13 14 15 16 17 18

Name of Candidate or Committee in Full
Wisconsin Bankers Political Action Committee ("Wisbankpac")

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Wisconsin Bankers Association 16 North Carroll Street Madison, Wisconsin 53703	Occupation	2/17/78	\$1,000.00
Receipt for: <u>9-21-10</u> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$ 1,000.00		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		

SUBTOTAL of receipts this page (optional) \$
TOTAL this period (last page this line number only) \$ 1,000.00

79040121579

ATTACHMENT #3



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

8/26
9/11

August 11, 1978

Francis A. Krause, Treasurer
Wisconsin Bankers Political
Action Committee
P.O. Box 96
Waterloo, Wisconsin 53594

Dear Mr. Krause:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. During review of the April 10 Quarterly Report of Receipts and Expenditures, we noticed an entry indicating that you may have accepted a contribution from a corporation. Corporate contributions are prohibited by the Act, unless the contribution is made by a separate segregated fund established by the corporation. A copy of that portion of your report is attached for your review and clarification.

The Commission recommends that if you have accepted a prohibited contribution that you return the full amount to the donor. The return of the contribution should be reported immediately by letter and should be reflected as a contribution refund on your next report of receipts and expenditures. If the identification of the source of this contribution is incomplete or incorrect on the original report, please submit a statement which would clarify this particular matter for the public record. You may do so by amending your original report by letter.

Please notify the Commission within fifteen (15) days from the date of this letter of the determination made on this matter. If you have any questions concerning this matter, please do not hesitate to contact Mark Kleinman (800)424-9530, our Reports Analyst assigned to you. Our local telephone number is 523-4048.

Sincerely,

Orlando B. Potter
Staff Director

Enclosure
Certified Mail:
Return Receipt Requested

79040121580

79040121581

ATTACHMENT #4

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions in-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

7803030195521582

Name of Candidate or Committee in Full			
Wisconsin Bankers Political Action Committee ("Wisbankpac")			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Friends of Flintrop	Campaign Fund	6/15/78	\$100.00
	Expenditure for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Friends of Chet Gerlach	Campaign Fund	6/16/78	\$200.00
	Expenditure for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Citizens for John Plewa	Campaign Fund	6/29/78	\$200.00
	Expenditure for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Wisconsin Bankers Association 16 North Carroll Street Madison, Wisconsin 53703	Administration Expense	6/12/78	\$277.00
	Expenditure for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Wisconsin Bankers Association 16 North Carroll Street Madison, Wisconsin 53703	Repayment of Loans (6 1/2% interest)	6/29/78	\$2,039.36
	Expenditure for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (optional).....			\$ 2,816.36
TOTAL this period (last page this line number only).....			\$ 5,041.36

DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 13
 of FEC FORM 3

(Indicate Primary or General Election for each Entry)

79040121583
 78030801956

Name of Candidate and Committee in Full Wisconsin Bankers Political Action Committee ("Wisbankpac")				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Wisconsin Bankers Association 16 North Carroll Street Madison, Wisconsin 53703	4/4/78	\$1,000.00	\$2,039.36	None
<input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt):				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
		\$	\$	\$
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt):				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
		\$	\$	\$
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				
NATURE OF OBLIGATION (Details of Debt):				
SUBTOTALS this period this page (optional)		\$	\$	\$
TOTAL this period (last page this line number only)		\$1,000.00	\$2,039.36	\$ None
Carry outstanding balance only to appropriate line of summary.				

79040121584

ATTACHMENT #5

EB
 V, 1978
 Election Commission
 K Street, N.W.
 gton, D.C. 20463

LIMITED EXPENDITURES
 (Operating, Transfers Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

Page 5 of for
 Line Number 22B

(Use Separate Schedules for
 each numbered line)

Name of Candidate or Committee in Full			
APRIL 10 QUARTERLY Q1-78			
Wisconsin Bankers Political Action Committee ("Wisbankpac")			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Citizens for Keppler	Campaign Fund	3/6/78	\$100.00
	Expenditure for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Citizens to Re-elect Hanke	Campaign Fund	3/6/78	\$100.00
	Expenditure for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Citizens for Pabst	Campaign Fund	3/6/78	\$100.00
	Expenditure for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Citizens for Plewa	Campaign Fund	3/6/78	\$100.00
	Expenditure for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Committee to Re-elect Robert E. Behnke	Campaign Fund	3/10/78	\$100.00
	Expenditure for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Friends of Steven Brist	Campaign Fund	3/10/78	\$100.00
	Expenditure for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (optional)			\$ 600.00
TOTAL this period (last page this line number only)			\$ 2,250.00

79040121586

ATTACHMENT #6

Name of Candidate or Committee in Full
Wisconsin Bankers Political Action Committee (Wisbankpac)

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Rec. this Period
Wisconsin Bankers Association 16 North Carroll Street Madison, Wisconsin 53703 9-21-10	Occupation	4/4/78	\$1,000.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$ 2,000.00		
Full Name, Mailing Address and ZIP Code Friends of Ron Parys returned \$500 of \$600 contribution - due to law stating candidates cannot exceed certain amount of contributions in	Principal Place of Business	Date (month, day, year)	Amount of each Rec. this Period
	Occupation	5/26/78	\$500.00
Receipt for: campaign year <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code (See Schedule 1A Attached)	Principal Place of Business	Date (month, day, year)	Amount of each Rec. this Period
	Occupation	(see attached)	9,925.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Rec. this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Rec. this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Rec. this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Rec. this Period
	Occupation		
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date . . . \$		
SUBTOTAL of receipts this page (optional)			\$
TOTAL this period (first page this line number only)			\$ 11,425.00

7904018345

ITEMIZED EXPENDITURES
 (Operating, Transfers Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

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Name of Candidate or Committee in Full Wisconsin Bankers Political Action Committee ("Wisbankpac")			
Full Name, Mailing Address and ZIP Code Friends of Flintrop	Particulars of Expenditure Campaign Fund	Date (month, day, year) 6/15/78	Amount of each expenditure this period \$100.00
	Expenditure for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code Friends of Chet Gerlach	Particulars of Expenditure Campaign Fund	Date (month, day, year) 6/16/78	Amount of each expenditure this period \$200.00
	Expenditure for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code Citizens for John Pleva	Particulars of Expenditure Campaign Fund	Date (month, day, year) 6/29/78	Amount of each expenditure this period \$200.00
	Expenditure for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code Wisconsin Bankers Association 16 North Carroll Street Madison, Wisconsin 53703	Particulars of Expenditure Administration Expense	Date (month, day, year) 6/12/78	Amount of each expenditure this period \$277.00
	Expenditure for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code Wisconsin Bankers Association 16 North Carroll Street Madison, Wisconsin 53703	Particulars of Expenditure Repayment of Loans (6 1/2% interest)	Date (month, day, year) 6/29/78	Amount of each expenditure this period \$2,039.36
	Expenditure for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (optional)			\$ 2,816.36
TOTAL this period (last page this line number only)			\$ 5,041.36

(Indicate Primary or General Election for each Entry)

Use separate schedules for each numbered line

Name of Candidate and Committee in Full
Wisconsin Bankers Political Action Committee ("Wisbankpac")

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Wisconsin Bankers Association 16 North Carroll Street Madison, Wisconsin 53703	4/4/78	\$1,000.00	\$2,039.36	None
<input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other				

NATURE OF OBLIGATION (Details of Debt):

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
		\$	\$	\$
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				

NATURE OF OBLIGATION (Details of Debt):

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
		\$	\$	\$
<input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other				

NATURE OF OBLIGATION (Details of Debt):

SUBTOTALS this period this page (optional)	\$	\$	\$
TOTAL this period (last page this line number only)	\$1,000.00	\$2,039.36	\$ None

Carry outstanding balance only to appropriate line of summary.

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FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20461

THIS IS THE BEGINNING OF MUR # 912

Date Filmed 4/27/79 Camera No. --- 2

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