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June 11, 2009

VIA FACSIMILE AND HAND DELIVERY

Ms. Lynn M. Fraser
Acting Director
Alternative Dispute Resolution Office
Federal Election Commission
999 E Street, NW
Washington, DC 20463

RE: ADR 493 (RAD 09L-17)

Dear Ms. Lynn:

Our firm represents the Texas Bankers Association (TBA) Bankers PAC (the "Committee") and its Treasurer, John M. Heasley. We are writing in response to your letters dated May 14 and June 1, 2009 in connection with the above referenced matter.

This issue came to our client's attention after an internal audit was voluntarily conducted by TBA staff in April, 2008 that identified reporting errors which were the result of both software malfunctions and a clerical data input mistake. Among the errors identified was an unreported disbursement to an affiliated committee in the amount of \$125,000. Upon identification of this error, TBA Bankers PAC immediately took the following remedial measures to correct the reporting errors and improve its internal controls and oversight procedures:

- TBA Bankers PAC worked with its software provider to identify and correct technical oversights which caused errors in its Beginning Cash on Hand balance;
- The Committee subsequently amended all previous affected reports as far back as January 1, 2004;
- On August 28, 2008, the TBA Bankers PAC filed an amendment to the 2007 August Monthly Report which contained the reporting error at issue in this matter;
- The unreported disbursement by TBA Bankers PAC was properly reported as a receipt by the affiliated committee on its regularly schedule report;
- The responsible employee left the organization and was replaced by better qualified personnel familiar with the Commission's rules and regulations; and
- The Committee now includes accounting staff in the preparation of its filings with a particular emphasis on the receipts and disbursements of TBA Bankers PAC.

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In addition, TBA Bankers PAC will also require new employees responsible for FEC reporting compliance to attend one of the Commission's annual filing workshops and to demonstrate adequate knowledge about FEC policy and procedure.

TBA Bankers PAC also contacted the undersigned outside counsel who will remain available on an as needed basis to ensure the Committee meets its FEC filing requirements in a timely and accurate manner.

The Committee remains open to discussing additional remedial measures to improve its internal controls and oversight policy in order to come to an expedient, efficient and final resolution of this matter.

Thank you for taking these stipulations and proposed terms to resolve this matter into consideration. We remain available to discuss this matter in detail at your convenience; including Monday, June 15 at 11:00 a.m. Eastern Time if that time would work well for you.

Sincerely,



Ryan D. Israel

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