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Form 990

Department of the TreasuryInternal Revenue Service

Return of Organization Exempt From Income Tax

Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations)

Do not enter social security numbers on this form as it may be made public

Go to www.irs.gov/Form990 for instructions and the latest information.

OMB No 1545-0047

2018

Open to Public Inspection

A For the 2019 calendar year, or tax year beginning 09-01-2018 , and ending 08-31-2019

B Check if applicable

☐ Address change

☐ Name change

☐ Initial return

☐ Final return/terminated

☐ Amended return

☐ Application pending

C Name of organization

AMERICAN BANKERS ASSOCIATION

Doing business as

Number and street (or P O box if mail is not delivered to street address)Room/suite

1120 CONNECTICUT AVE NW

City or town, state or province, country, and ZIP or foreign postal code

WASHINGTON, DC 20036

F Name and address of principal officer

ROBERT S NICHOLS

1120 CONNECTICUT AVE NW

WASHINGTON, DC 20036

D Employer identification number

52-1001304

E Telephone number

(202) 663-5054

G Gross receipts \$ 209,553,193

I Tax-exempt status

☐ 501(c)(3)

☒ 501(c) (6)

(insert no)

☐ 4947(a)(1) or

☐ 527

J Website: WW ABA COM

K Form of organization

☒ Corporation

☐ Trust

☐ Association

☐ Other

L Year of formation 1875

M State of legal domicile DC

Part ISummary

Activities & Governance

1 Briefly describe the organization's mission or most significant activities

(SEE SCHEDULE O)THE AMERICAN BANKERS ASSOCIATION IS A BUSINESS LEAGUE THAT PURSUES ADVOCACY, PROVIDES EDUCATION, PRODUCTS AND SOLUTIONS TO ITS MEMBERSHIP AND THE FINANCIAL SERVICES INDUSTRY GENERALLY

2 Check this box if the organization discontinued its operations or disposed of more than 25% of its net assets

☐

3 Number of voting members of the governing body (Part VI, line 1a)

31

4 Number of independent voting members of the governing body (Part VI, line 1b)

30

5 Total number of individuals employed in calendar year 2018 (Part V, line 2a)

420

6 Total number of volunteers (estimate if necessary)

1,200

7a Total unrelated business revenue from Part VIII, column (C), line 12

1,465,332

7b Net unrelated business taxable income from Form 990-T, line 34

0

Revenue

8 Contributions and grants (Part VIII, line 1h)

662,300

9 Program service revenue (Part VIII, line 2g)

79,460,302

10 Investment income (Part VIII, column (A), lines 3, 4, and 7d)

10,240,077

11 Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e)

30,879,598

12 Total revenue—add lines 8 through 11 (must equal Part VIII, column (A), line 12)

121,242,277

Expenses

13 Grants and similar amounts paid (Part IX, column (A), lines 1–3)

365,645

14 Benefits paid to or for members (Part IX, column (A), line 4)

0

15 Salaries, other compensation, employee benefits (Part IX, column (A), lines 5–10)

66,023,100

16a Professional fundraising fees (Part IX, column (A), line 11e)

0

b Total fundraising expenses (Part IX, column (D), line 25)

0

17 Other expenses (Part IX, column (A), lines 11a–11d, 11f–24e)

44,128,644

18 Total expenses Add lines 13–17 (must equal Part IX, column (A), line 25)

110,517,389

19 Revenue less expenses Subtract line 18 from line 12

10,724,888

Net Assets or Fund Balances

20 Total assets (Part X, line 16)

218,048,967

21 Total liabilities (Part X, line 26)

139,711,719

22 Net assets or fund balances Subtract line 21 from line 20

78,337,248

Part IISignature Block

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge

Signature of officer

2020-07-12

Date

KARIN PETERSEN FLYNN CHIEF FINANCIAL OFFICER

Type or print name and title

Paid Preparer Use Only

Print/Type preparer's name

Preparer's signature

Date

Check if self-employed

PTIN P00369217

Firm's name RSM US LLP

Firm's EIN 42-0714325

Firm's address 9801 WASHINGTONIAN BLVD STE 500

Phone no (301) 296-3600

GAITHERSBURG, MD 20878

May the IRS discuss this return with the preparer shown above? (see instructions)

☒ Yes

☐ No

For Paperwork Reduction Act Notice, see the separate instructions.

Cat No 11282Y

Form 990 (2018)

Part III Statement of Program Service AccomplishmentsCheck if Schedule O contains a response or note to any line in this Part III ☒**1** Briefly describe the organization's mission

(SEE SCHEDULE O) THE ABA'S MISSION IS TO BE A MEMBER-FOCUSED ORGANIZATION THAT PROVIDES ADVOCACY, EDUCATION, BUSINESS SOLUTIONS, AND FORUMS FOR AN EXCHANGE OF VIEWS AND INFORMATION THAT ASSISTS OUR MEMBERS IN PROVIDING FINANCIAL SERVICES TO THEIR COMMUNITIES IN COMPLIANCE WITH THE COMPLEX AND CHALLENGING REGULATORY AND STATUTORY ENVIRONMENT THAT GOVERNS THEIR OPERATIONS

2 Did the organization undertake any significant program services during the year which were not listed on the prior Form 990 or 990-EZ?☐ Yes ☒ No

If "Yes," describe these new services on Schedule O

3 Did the organization cease conducting, or make significant changes in how it conducts, any program services?☐ Yes ☒ No

If "Yes," describe these changes on Schedule O

4 Describe the organization's program service accomplishments for each of its three largest program services, as measured by expenses. Section 501(c)(3) and 501(c)(4) organizations are required to report the amount of grants and allocations to others, the total expenses, and revenue, if any, for each program service reported

4a (Code) (Expenses \$ including grants of \$) (Revenue \$)
See Additional Data

4b (Code) (Expenses \$ including grants of \$) (Revenue \$)
See Additional Data

4c (Code) (Expenses \$ including grants of \$) (Revenue \$)
See Additional Data

4d Other program services (Describe in Schedule O)
(Expenses \$ including grants of \$) (Revenue \$)

4e Total program service expenses ►

Part IV Checklist of Required Schedules

	Yes	No
1 Is the organization described in section 501(c)(3) or 4947(a)(1) (other than a private foundation)? If "Yes," complete Schedule A	1	No
2 Is the organization required to complete Schedule B, Schedule of Contributors (see instructions)? 	2	Yes
3 Did the organization engage in direct or indirect political campaign activities on behalf of or in opposition to candidates for public office? If "Yes," complete Schedule C, Part I 	3	Yes
4 Section 501(c)(3) organizations. Did the organization engage in lobbying activities, or have a section 501(h) election in effect during the tax year? If "Yes," complete Schedule C, Part II	4	
5 Is the organization a section 501(c)(4), 501(c)(5), or 501(c)(6) organization that receives membership dues, assessments, or similar amounts as defined in Revenue Procedure 98-19? If "Yes," complete Schedule C, Part III 	5	Yes
6 Did the organization maintain any donor advised funds or any similar funds or accounts for which donors have the right to provide advice on the distribution or investment of amounts in such funds or accounts? If "Yes," complete Schedule D, Part I 	6	No
7 Did the organization receive or hold a conservation easement, including easements to preserve open space, the environment, historic land areas, or historic structures? If "Yes," complete Schedule D, Part II 	7	No
8 Did the organization maintain collections of works of art, historical treasures, or other similar assets? If "Yes," complete Schedule D, Part III 	8	No
9 Did the organization report an amount in Part X, line 21 for escrow or custodial account liability, serve as a custodian for amounts not listed in Part X, or provide credit counseling, debt management, credit repair, or debt negotiation services? If "Yes," complete Schedule D, Part IV 	9	No
10 Did the organization, directly or through a related organization, hold assets in temporarily restricted endowments, permanent endowments, or quasi-endowments? If "Yes," complete Schedule D, Part V 	10	No
11 If the organization's answer to any of the following questions is "Yes," then complete Schedule D, Parts VI, VII, VIII, IX, or X as applicable		
a Did the organization report an amount for land, buildings, and equipment in Part X, line 10? If "Yes," complete Schedule D, Part VI 	11a	Yes
b Did the organization report an amount for investments—other securities in Part X, line 12 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part VII 	11b	No
c Did the organization report an amount for investments—program related in Part X, line 13 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part VIII 	11c	No
d Did the organization report an amount for other assets in Part X, line 15 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part IX 	11d	Yes
e Did the organization report an amount for other liabilities in Part X, line 25? If "Yes," complete Schedule D, Part X 	11e	Yes
f Did the organization's separate or consolidated financial statements for the tax year include a footnote that addresses the organization's liability for uncertain tax positions under FIN 48 (ASC 740)? If "Yes," complete Schedule D, Part X 	11f	Yes
12a Did the organization obtain separate, independent audited financial statements for the tax year? If "Yes," complete Schedule D, Parts XI and XII 	12a	No
b Was the organization included in consolidated, independent audited financial statements for the tax year? If "Yes," and if the organization answered "No" to line 12a, then completing Schedule D, Parts XI and XII is optional 	12b	Yes
13 Is the organization a school described in section 170(b)(1)(A)(ii)? If "Yes," complete Schedule E	13	No
14a Did the organization maintain an office, employees, or agents outside of the United States?	14a	No
b Did the organization have aggregate revenues or expenses of more than \$10,000 from grantmaking, fundraising, business, investment, and program service activities outside the United States, or aggregate foreign investments valued at \$100,000 or more? If "Yes," complete Schedule F, Parts I and IV	14b	No
15 Did the organization report on Part IX, column (A), line 3, more than \$5,000 of grants or other assistance to or for any foreign organization? If "Yes," complete Schedule F, Parts II and IV	15	No
16 Did the organization report on Part IX, column (A), line 3, more than \$5,000 of aggregate grants or other assistance to or for foreign individuals? If "Yes," complete Schedule F, Parts III and IV	16	No
17 Did the organization report a total of more than \$15,000 of expenses for professional fundraising services on Part IX, column (A), lines 6 and 11e? If "Yes," complete Schedule G, Part I (see instructions)	17	No
18 Did the organization report more than \$15,000 total of fundraising event gross income and contributions on Part VIII, lines 1c and 8a? If "Yes," complete Schedule G, Part II	18	No
19 Did the organization report more than \$15,000 of gross income from gaming activities on Part VIII, line 9a? If "Yes," complete Schedule G, Part III	19	No
20a Did the organization operate one or more hospital facilities? If "Yes," complete Schedule H	20a	No
b If "Yes" to line 20a, did the organization attach a copy of its audited financial statements to this return?	20b	
21 Did the organization report more than \$5,000 of grants or other assistance to any domestic organization or domestic government on Part IX, column (A), line 1? If "Yes," complete Schedule I, Parts I and II 	21	Yes
22 Did the organization report more than \$5,000 of grants or other assistance to or for domestic individuals on Part IX, column (A), line 2? If "Yes," complete Schedule I, Parts I and III 	22	No

Part IV Checklist of Required Schedules (continued)

	Yes	No
23 Did the organization answer "Yes" to Part VII, Section A, line 3, 4, or 5 about compensation of the organization's current and former officers, directors, trustees, key employees, and highest compensated employees? <i>If "Yes," complete Schedule J</i>	23 Yes	
24a Did the organization have a tax-exempt bond issue with an outstanding principal amount of more than \$100,000 as of the last day of the year, that was issued after December 31, 2002? <i>If "Yes," answer lines 24b through 24d and complete Schedule K. If "No," go to line 25a</i>	24a	No
b Did the organization invest any proceeds of tax-exempt bonds beyond a temporary period exception?	24b	
c Did the organization maintain an escrow account other than a refunding escrow at any time during the year to defease any tax-exempt bonds?	24c	
d Did the organization act as an "on behalf of" issuer for bonds outstanding at any time during the year?	24d	
25a Section 501(c)(3), 501(c)(4), and 501(c)(29) organizations. Did the organization engage in an excess benefit transaction with a disqualified person during the year? <i>If "Yes," complete Schedule L, Part I</i>	25a	
b Is the organization aware that it engaged in an excess benefit transaction with a disqualified person in a prior year, and that the transaction has not been reported on any of the organization's prior Forms 990 or 990-EZ? <i>If "Yes," complete Schedule L, Part I</i>	25b	
26 Did the organization report any amount on Part X, line 5, 6, or 22 for receivables from or payables to any current or former officers, directors, trustees, key employees, highest compensated employees, or disqualified persons? <i>If "Yes," complete Schedule L, Part II</i>	26	No
27 Did the organization provide a grant or other assistance to an officer, director, trustee, key employee, substantial contributor or employee thereof, a grant selection committee member, or to a 35% controlled entity or family member of any of these persons? <i>If "Yes," complete Schedule L, Part III</i>	27	No
28 Was the organization a party to a business transaction with one of the following parties (see Schedule L, Part IV instructions for applicable filing thresholds, conditions, and exceptions)		
a A current or former officer, director, trustee, or key employee? <i>If "Yes," complete Schedule L, Part IV</i>	28a	No
b A family member of a current or former officer, director, trustee, or key employee? <i>If "Yes," complete Schedule L, Part IV</i>	28b	No
c An entity of which a current or former officer, director, trustee, or key employee (or a family member thereof) was an officer, director, trustee, or direct or indirect owner? <i>If "Yes," complete Schedule L, Part IV</i>	28c	No
29 Did the organization receive more than \$25,000 in non-cash contributions? <i>If "Yes," complete Schedule M</i>	29	No
30 Did the organization receive contributions of art, historical treasures, or other similar assets, or qualified conservation contributions? <i>If "Yes," complete Schedule M</i>	30	No
31 Did the organization liquidate, terminate, or dissolve and cease operations? <i>If "Yes," complete Schedule N, Part I</i>	31	No
32 Did the organization sell, exchange, dispose of, or transfer more than 25% of its net assets? <i>If "Yes," complete Schedule N, Part II</i>	32	No
33 Did the organization own 100% of an entity disregarded as separate from the organization under Regulations sections 301.7701-2 and 301.7701-3? <i>If "Yes," complete Schedule R, Part I</i>	33 Yes	
34 Was the organization related to any tax-exempt or taxable entity? <i>If "Yes," complete Schedule R, Part II, III, or IV, and Part V, line 1</i>	34 Yes	
35a Did the organization have a controlled entity within the meaning of section 512(b)(13)?	35a Yes	
b If 'Yes' to line 35a, did the organization receive any payment from or engage in any transaction with a controlled entity within the meaning of section 512(b)(13)? <i>If "Yes," complete Schedule R, Part V, line 2</i>	35b Yes	
36 Section 501(c)(3) organizations. Did the organization make any transfers to an exempt non-charitable related organization? <i>If "Yes," complete Schedule R, Part V, line 2</i>	36	
37 Did the organization conduct more than 5% of its activities through an entity that is not a related organization and that is treated as a partnership for federal income tax purposes? <i>If "Yes," complete Schedule R, Part VI</i>	37	No
38 Did the organization complete Schedule O and provide explanations in Schedule O for Part VI, lines 11b and 19? Note. All Form 990 filers are required to complete Schedule O	38 Yes	

Part V Statements Regarding Other IRS Filings and Tax ComplianceCheck if Schedule O contains a response or note to any line in this Part V ☐

	Yes	No
1a Enter the number reported in Box 3 of Form 1096. Enter -0- if not applicable	1a 431	
b Enter the number of Forms W-2G included in line 1a. Enter -0- if not applicable	1b 0	
c Did the organization comply with backup withholding rules for reportable payments to vendors and reportable gaming (gambling) winnings to prize winners?	1c Yes	

2a Enter the number of employees reported on Form W-3, Transmittal of Wage and Tax Statements, filed for the calendar year ending with or within the year covered by this return		2a	420			
b If at least one is reported on line 2a, did the organization file all required federal employment tax returns? Note. If the sum of lines 1a and 2a is greater than 250, you may be required to e-file (see instructions)				2b	Yes	
3a Did the organization have unrelated business gross income of \$1,000 or more during the year?				3a	Yes	
b If "Yes," has it filed a Form 990-T for this year? If "No" to line 3b, provide an explanation in Schedule O				3b	Yes	
4a At any time during the calendar year, did the organization have an interest in, or a signature or other authority over, a financial account in a foreign country (such as a bank account, securities account, or other financial account)?				4a		No
b If "Yes," enter the name of the foreign country ▶ _____ See instructions for filing requirements for FinCEN Form 114, Report of Foreign Bank and Financial Accounts (FBAR)						
5a Was the organization a party to a prohibited tax shelter transaction at any time during the tax year?				5a		No
b Did any taxable party notify the organization that it was or is a party to a prohibited tax shelter transaction?				5b		No
c If "Yes," to line 5a or 5b, did the organization file Form 8886-T?				5c		
6a Does the organization have annual gross receipts that are normally greater than \$100,000, and did the organization solicit any contributions that were not tax deductible as charitable contributions?				6a	Yes	
b If "Yes," did the organization include with every solicitation an express statement that such contributions or gifts were not tax deductible?				6b	Yes	
7 Organizations that may receive deductible contributions under section 170(c).						
a Did the organization receive a payment in excess of \$75 made partly as a contribution and partly for goods and services provided to the payor?				7a		
b If "Yes," did the organization notify the donor of the value of the goods or services provided?				7b		
c Did the organization sell, exchange, or otherwise dispose of tangible personal property for which it was required to file Form 8282?				7c		
d If "Yes," indicate the number of Forms 8282 filed during the year				7d		
e Did the organization receive any funds, directly or indirectly, to pay premiums on a personal benefit contract?				7e		
f Did the organization, during the year, pay premiums, directly or indirectly, on a personal benefit contract?				7f		
g If the organization received a contribution of qualified intellectual property, did the organization file Form 8899 as required?				7g		
h If the organization received a contribution of cars, boats, airplanes, or other vehicles, did the organization file a Form 1098-C?				7h		
8 Sponsoring organizations maintaining donor advised funds. Did a donor advised fund maintained by the sponsoring organization have excess business holdings at any time during the year?				8		
9a Did the sponsoring organization make any taxable distributions under section 4966?				9a		
b Did the sponsoring organization make a distribution to a donor, donor advisor, or related person?				9b		
10 Section 501(c)(7) organizations. Enter						
a Initiation fees and capital contributions included on Part VIII, line 12				10a		
b Gross receipts, included on Form 990, Part VIII, line 12, for public use of club facilities				10b		
11 Section 501(c)(12) organizations. Enter						
a Gross income from members or shareholders				11a		
b Gross income from other sources (Do not net amounts due or paid to other sources against amounts due or received from them)				11b		
12a Section 4947(a)(1) non-exempt charitable trusts. Is the organization filing Form 990 in lieu of Form 1041?				12a		
b If "Yes," enter the amount of tax-exempt interest received or accrued during the year				12b		
13 Section 501(c)(29) qualified nonprofit health insurance issuers.						
a Is the organization licensed to issue qualified health plans in more than one state? Note. See the instructions for additional information the organization must report on Schedule O				13a		
b Enter the amount of reserves the organization is required to maintain by the states in which the organization is licensed to issue qualified health plans				13b		
c Enter the amount of reserves on hand				13c		
14a Did the organization receive any payments for indoor tanning services during the tax year?				14a		No
b If "Yes," has it filed a Form 720 to report these payments? If "No," provide an explanation in Schedule O				14b		
15 Is the organization subject to the section 4960 tax on payment(s) of more than \$1,000,000 in remuneration or excess parachute payment(s) during the year? If "Yes," see instructions and file Form 4720, Schedule N				15	Yes	
16 Is the organization an educational institution subject to the section 4968 excise tax on net investment income? If "Yes," complete Form 4720, Schedule O				16		No

Part VI

Governance, Management, and Disclosure For each "Yes" response to lines 2 through 7b below, and for a "No" response to lines 8a, 8b, or 10b below, describe the circumstances, processes, or changes in Schedule O. See instructions.

Check if Schedule O contains a response or note to any line in this Part VI ☒

Section A. Governing Body and Management

		Yes	No
1a Enter the number of voting members of the governing body at the end of the tax year	1a 31		
If there are material differences in voting rights among members of the governing body, or if the governing body delegated broad authority to an executive committee or similar committee, explain in Schedule O			
b Enter the number of voting members included in line 1a, above, who are independent	1b 30		
2 Did any officer, director, trustee, or key employee have a family relationship or a business relationship with any other officer, director, trustee, or key employee?	2		No
3 Did the organization delegate control over management duties customarily performed by or under the direct supervision of officers, directors or trustees, or key employees to a management company or other person?	3		No
4 Did the organization make any significant changes to its governing documents since the prior Form 990 was filed?	4		No
5 Did the organization become aware during the year of a significant diversion of the organization's assets?	5		No
6 Did the organization have members or stockholders?	6	Yes	
7a Did the organization have members, stockholders, or other persons who had the power to elect or appoint one or more members of the governing body?	7a	Yes	
b Are any governance decisions of the organization reserved to (or subject to approval by) members, stockholders, or persons other than the governing body?	7b	Yes	
8 Did the organization contemporaneously document the meetings held or written actions undertaken during the year by the following:			
a The governing body?	8a	Yes	
b Each committee with authority to act on behalf of the governing body?	8b	Yes	
9 Is there any officer, director, trustee, or key employee listed in Part VII, Section A, who cannot be reached at the organization's mailing address? If "Yes," provide the names and addresses in Schedule O.	9		No

Section B. Policies (This Section B requests information about policies not required by the Internal Revenue Code.)

	Yes	No
10a Did the organization have local chapters, branches, or affiliates?	10a	No
b If "Yes," did the organization have written policies and procedures governing the activities of such chapters, affiliates, and branches to ensure their operations are consistent with the organization's exempt purposes?	10b	
11a Has the organization provided a complete copy of this Form 990 to all members of its governing body before filing the form?	11a	No
b Describe in Schedule O the process, if any, used by the organization to review this Form 990.		
12a Did the organization have a written conflict of interest policy? If "No," go to line 13.	12a	Yes
b Were officers, directors, or trustees, and key employees required to disclose annually interests that could give rise to conflicts?	12b	Yes
c Did the organization regularly and consistently monitor and enforce compliance with the policy? If "Yes," describe in Schedule O how this was done.	12c	Yes
13 Did the organization have a written whistleblower policy?	13	Yes
14 Did the organization have a written document retention and destruction policy?	14	Yes
15 Did the process for determining compensation of the following persons include a review and approval by independent persons, comparability data, and contemporaneous substantiation of the deliberation and decision?		
a The organization's CEO, Executive Director, or top management official	15a	Yes
b Other officers or key employees of the organization	15b	Yes
If "Yes" to line 15a or 15b, describe the process in Schedule O (see instructions)		
16a Did the organization invest in, contribute assets to, or participate in a joint venture or similar arrangement with a taxable entity during the year?	16a	Yes
b If "Yes," did the organization follow a written policy or procedure requiring the organization to evaluate its participation in joint venture arrangements under applicable federal tax law, and take steps to safeguard the organization's exempt status with respect to such arrangements?	16b	Yes

Section C. Disclosure

17 List the States with which a copy of this Form 990 is required to be filed: _____

18 Section 6104 requires an organization to make its Form 1023 (or 1024-A if applicable), 990, and 990-T (501(c)(3)s only) available for public inspection. Indicate how you made these available. Check all that apply.

☐ Own website ☐ Another's website ☒ Upon request ☐ Other (explain in Schedule O)

19 Describe in Schedule O whether (and if so, how) the organization made its governing documents, conflict of interest policy, and financial statements available to the public during the tax year.

20 State the name, address, and telephone number of the person who possesses the organization's books and records:
 ► BARRY EPSTEIN 1120 CONNECTICUT AVE NW WASHINGTON, DC 20036 (202) 663-5054

Compensation of Officers, Directors, Trustees, Key Employees, Highest Compensated Employees, and Independent Contractors

Check if Schedule O contains a response or note to any line in this Part VII ☐

1

● List all of the organization's **current** officers, directors, trustees (whether individuals or organizations), regardless of amount of compensation. Enter -0- in columns (D), (E), and (F) if no compensation was paid.

● List all of the organization's **current** key employees, if any. See instructions for definition of "key employee."

• List the organization's five **current** highest compensated employees (other than an officer, director, trustee or key employee) who received reportable compensation (Box 5 of Form W-2 and/or Box 7 of Form 1099-MISC) of more than \$100,000 from the organization and any related organizations

● List all of the organization's **former** officers, key employees, or highest compensated employees who received more than \$100,000 of reportable compensation from the organization and any related organizations

• List all of the organization's **former directors or trustees** that received, in the capacity as a former director or trustee of the organization, more than \$10,000 of reportable compensation from the organization and any related organizations

List persons in the following order: individual trustees or directors; institutional trustees; officers; key employees; highest compensated employees; and former such persons

☐ Check this box if neither the organization nor any related organization compensated any current officer, director, or trustee

[illegible]

Part VII Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees (continued)

[illegible]

1b Sub-Total			
c Total from continuation sheets to Part VII, Section A			
d Total (add lines 1b and 1c)	10,638,637	0	5,660,082

2 Total number of individuals (including but not limited to those listed above) who received more than \$100,000 of reportable compensation from the organization ▶ 190

		Yes	No
3	Did the organization list any former officer, director or trustee, key employee, or highest compensated employee on line 1a? <i>If "Yes," complete Schedule J for such individual</i>	3 Yes	
4	For any individual listed on line 1a, is the sum of reportable compensation and other compensation from the organization and related organizations greater than \$150,000? <i>If "Yes," complete Schedule J for such individual</i>	4 Yes	
5	Did any person listed on line 1a receive or accrue compensation from any unrelated organization or individual for services rendered to the organization? <i>If "Yes," complete Schedule J for such person</i>	5	No

Section B. Independent Contractors

1 Complete this table for your five highest compensated independent contractors that received more than \$100,000 of compensation from the organization. Report compensation for the calendar year ending with or within the organization's tax year.

(A) Name and business address	(B) Description of services	(C) Compensation
SOMETHING ELSE STRATEGIES 112 LATTERN RIDGE DRIVE EASLEY, SC 29642	CONSULTING	835,768
SAPIENT GOVERNMENT SERVICES INC 1515 N COURTHOUSE RD 4TH FLOOR ARLINGTON, VA 22201	CONSULTING	793,745
PRODUCT RESOURCE GROUP 901 7TH STREET NW 4TH FLOOR WASHINGTON, DC 20001	CONSULTING	755,107
COGENT STRATEGIES LLC 2550 M STREET NW WASHINGTON, DC 20037	CONSULTING	749,500
AMEDIA 4948 ST ELMO AVE BETHESDA, MD 20814	CONSULTING	473,220

2 Total number of independent contractors (including but not limited to those listed above) who received more than \$100,000 of compensation from the organization ► 44	
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Part VIII Statement of Revenue

Check if Schedule O contains a response or note to any line in this Part VIII ☐

Contributions, Gifts, Grants
and Other Similar Amounts

	(A) Total revenue	(B) Related or exempt function revenue	(C) Unrelated business revenue	(D) Revenue excluded from tax under sections 512 - 514
1a Federated campaigns	1a			
b Membership dues	1b			
c Fundraising events	1c			
d Related organizations	1d			
e Government grants (contributions)	1e			
f All other contributions, gifts, grants, and similar amounts not included above	1f	983,315		
g Noncash contributions included in lines 1a - 1f \$				
h Total. Add lines 1a-1f		983,315		

Program Service Revenue

	Business Code				
2a MEMBERSHIP DUES	813910	41,007,918	41,007,918		
b SCHOOL & IN-BANK TRAIN	813910	16,283,363	16,233,731		49,632
c CONFERENCE & CONVENTIO	813910	13,150,119	7,586,929	459,750	5,103,440
d DUES & FEES ARRANGEMEN	813910	6,008,744	6,008,744		
e PUBLICATIONS & SUBSCRI	813910	792,208	518,247	45,034	228,927
f All other program service revenue		4,172,357	4,125,547	46,810	
g Total. Add lines 2a-2f		81,414,709			

Other Revenue

3 Investment income (including dividends, interest, and other similar amounts)		1,915,162			1,915,162
4 Income from investment of tax-exempt bond proceeds					
5 Royalties		36,501,445		913,738	35,587,707
6a Gross rents	(i) Real	(ii) Personal			
b Less rental expenses					
c Rental income or (loss)					
d Net rental income or (loss)					
7a Gross amount from sales of assets other than inventory	(i) Securities	(ii) Other			
b Less cost or other basis and sales expenses	87,552,327				
c Gain or (loss)	74,057,173				
d Net gain or (loss)	13,495,154		13,495,154		13,495,154
8a Gross income from fundraising events (not including \$ of contributions reported on line 1c) See Part IV, line 18	a				
b Less direct expenses	b				
c Net income or (loss) from fundraising events					
9a Gross income from gaming activities See Part IV, line 19	a				
b Less direct expenses	b				
c Net income or (loss) from gaming activities					
10a Gross sales of inventory, less returns and allowances	a	1,186,235			
b Less cost of goods sold	b	170,917			
c Net income or (loss) from sales of inventory		1,015,318	1,015,318		
Miscellaneous Revenue	Business Code				
11a					
b					
c					
d All other revenue					
e Total. Add lines 11a-11d					
12 Total revenue. See Instructions		135,325,103	76,496,434	1,465,332	56,380,022

Part IX Statement of Functional Expenses

Section 501(c)(3) and 501(c)(4) organizations must complete all columns. All other organizations must complete column (A).

Check if Schedule O contains a response or note to any line in this Part IX ☒**Do not include amounts reported on lines 6b, 7b, 8b, 9b, and 10b of Part VIII.**

	(A) Total expenses	(B) Program service expenses	(C) Management and general expenses	(D) Fundraising expenses
1 Grants and other assistance to domestic organizations and domestic governments. See Part IV, line 21.	372,227			
2 Grants and other assistance to domestic individuals. See Part IV, line 22.				
3 Grants and other assistance to foreign organizations, foreign governments, and foreign individuals. See Part IV, line 15 and 16.				
4 Benefits paid to or for members.				
5 Compensation of current officers, directors, trustees, and key employees.	10,196,026			
6 Compensation not included above, to disqualified persons (as defined under section 4958(f)(1)) and persons described in section 4958(c)(3)(B).				
7 Other salaries and wages.	42,557,287			
8 Pension plan accruals and contributions (include section 401 (k) and 403(b) employer contributions).	9,981,568			
9 Other employee benefits.	4,140,414			
10 Payroll taxes.	3,314,676			
11 Fees for services (non-employees):				
a Management.				
b Legal.	1,274,824			
c Accounting.	130,775			
d Lobbying.	2,015,610			
e Professional fundraising services. See Part IV, line 17.				
f Investment management fees.	506,643			
g Other (If line 11g amount exceeds 10% of line 25, column (A) amount, list line 11g expenses on Schedule O).	13,833,014			
12 Advertising and promotion.	3,061,662			
13 Office expenses.	2,017,813			
14 Information technology.	1,846,052			
15 Royalties.	1,887,808			
16 Occupancy.	6,787,024			
17 Travel.	4,537,081			
18 Payments of travel or entertainment expenses for any federal, state, or local public officials.				
19 Conferences, conventions, and meetings.	7,448,105			
20 Interest.	4,384			
21 Payments to affiliates.				
22 Depreciation, depletion, and amortization.	2,279,604			
23 Insurance.	790,853			
24 Other expenses. Itemize expenses not covered above (List miscellaneous expenses in line 24e. If line 24e amount exceeds 10% of line 25, column (A) amount, list line 24e expenses on Schedule O):				
a SPONSORSHIP, MEMBERSHIP	971,190			
b PRINTING & PUBLICATIONS	889,589			
c FEDERAL & STATE TAXES	431,709			
d ALLOCATED OVERHEAD	-4,790,105			
e All other expenses	3,480,028			
25 Total functional expenses. Add lines 1 through 24e.	119,965,861			
26 Joint costs. Complete this line only if the organization reported in column (B) joint costs from a combined educational campaign and fundraising solicitation. Check here ☐ if following SOP 98-2 (ASC 958-720)				

Part X Balance SheetCheck if Schedule O contains a response or note to any line in this Part IX ☐

				(A) Beginning of year		(B) End of year	
Assets	1	Cash—non-interest-bearing			1		
	2	Savings and temporary cash investments		16,908,092	2	30,927,240	
	3	Pledges and grants receivable, net			3		
	4	Accounts receivable, net		11,185,140	4	12,744,145	
	5	Loans and other receivables from current and former officers, directors, trustees, key employees, and highest compensated employees. Complete Part II of Schedule L			5		
	6	Loans and other receivables from other disqualified persons (as defined under section 4958(f)(1)), persons described in section 4958(c)(3)(B), and contributing employers and sponsoring organizations of section 501(c)(9) voluntary employees' beneficiary organizations (see instructions). Complete Part II of Schedule L			6		
	7	Notes and loans receivable, net			7		
	8	Inventories for sale or use		45,958	8	21,640	
	9	Prepaid expenses and deferred charges		2,922,485	9	2,997,574	
	10a	Land, buildings, and equipment—cost or other basis. Complete Part VI of Schedule D	10a	23,350,001			
	b	Less: accumulated depreciation	10b	16,786,762	5,171,558	10c	6,563,239
	11	Investments—publicly traded securities		149,507,945	11	138,437,643	
	12	Investments—other securities. See Part IV, line 11			12		
	13	Investments—program-related. See Part IV, line 11			13		
	14	Intangible assets			14		
	15	Other assets. See Part IV, line 11		32,307,789	15	32,539,454	
16	Total assets. Add lines 1 through 15 (must equal line 34)		218,048,967	16	224,230,935		
Liabilities	17	Accounts payable and accrued expenses		9,696,576	17	12,357,337	
	18	Grants payable			18		
	19	Deferred revenue		46,936,469	19	48,299,399	
	20	Tax-exempt bond liabilities			20		
	21	Escrow or custodial account liability. Complete Part IV of Schedule D			21		
	22	Loans and other payables to current and former officers, directors, trustees, key employees, highest compensated employees, and disqualified persons. Complete Part II of Schedule L			22		
	23	Secured mortgages and notes payable to unrelated third parties			23		
	24	Unsecured notes and loans payable to unrelated third parties			24		
	25	Other liabilities (including federal income tax, payables to related third parties, and other liabilities not included on lines 17 - 24). Complete Part X of Schedule D		83,078,674	25	116,718,496	
	26	Total liabilities. Add lines 17 through 25		139,711,719	26	177,375,232	
Net Assets or Fund Balances	Organizations that follow SFAS 117 (ASC 958), check here ► ☒ and complete lines 27 through 29, and lines 33 and 34.						
	27	Unrestricted net assets		78,337,248	27	45,313,987	
	28	Temporarily restricted net assets			28	1,541,716	
	29	Permanently restricted net assets			29		
	Organizations that do not follow SFAS 117 (ASC 958), check here ► ☐ and complete lines 30 through 34.						
	30	Capital stock or trust principal, or current funds			30		
	31	Paid-in or capital surplus, or land, building or equipment fund			31		
	32	Retained earnings, endowment, accumulated income, or other funds			32		
33	Total net assets or fund balances		78,337,248	33	46,855,703		
34	Total liabilities and net assets/fund balances		218,048,967	34	224,230,935		

Part XI Reconciliation of Net AssetsCheck if Schedule O contains a response or note to any line in this Part XI ☒

1	Total revenue (must equal Part VIII, column (A), line 12)	1	135,325,103
2	Total expenses (must equal Part IX, column (A), line 25)	2	119,965,861
3	Revenue less expenses Subtract line 2 from line 1	3	15,359,242
4	Net assets or fund balances at beginning of year (must equal Part X, line 33, column (A))	4	78,337,248
5	Net unrealized gains (losses) on investments	5	-11,356,657
6	Donated services and use of facilities	6	
7	Investment expenses	7	
8	Prior period adjustments	8	
9	Other changes in net assets or fund balances (explain in Schedule O)	9	-35,484,130
10	Net assets or fund balances at end of year Combine lines 3 through 9 (must equal Part X, line 33, column (B))	10	46,855,703

Part XII Financial Statements and ReportingCheck if Schedule O contains a response or note to any line in this Part XII ☐

	Yes	No
1 Accounting method used to prepare the Form 990 ☐ Cash ☒ Accrual ☐ Other _____ If the organization changed its method of accounting from a prior year or checked "Other," explain in Schedule O		
2a Were the organization's financial statements compiled or reviewed by an independent accountant? If 'Yes,' check a box below to indicate whether the financial statements for the year were compiled or reviewed on a separate basis, consolidated basis, or both ☐ Separate basis ☐ Consolidated basis ☐ Both consolidated and separate basis		No
b Were the organization's financial statements audited by an independent accountant? If 'Yes,' check a box below to indicate whether the financial statements for the year were audited on a separate basis, consolidated basis, or both ☐ Separate basis ☒ Consolidated basis ☐ Both consolidated and separate basis	Yes	
c If "Yes," to line 2a or 2b, does the organization have a committee that assumes responsibility for oversight of the audit, review, or compilation of its financial statements and selection of an independent accountant? If the organization changed either its oversight process or selection process during the tax year, explain in Schedule O	Yes	
3a As a result of a federal award, was the organization required to undergo an audit or audits as set forth in the Single Audit Act and OMB Circular A-133?		No
b If "Yes," did the organization undergo the required audit or audits? If the organization did not undergo the required audit or audits, explain why in Schedule O and describe any steps taken to undergo such audits		

Additional Data

Software ID:
Software Version:
EIN: 52-1001304
Name: AMERICAN BANKERS ASSOCIATION

Form 990 (2018)

Form 990, Part III, Line 4a:

CONVENTION, CONFERENCES, SCHOOLS, PROFESSIONAL CERTIFICATIONS AND REMOTE LEARNING OPPORTUNITIES THE FINANCIAL SERVICES INDUSTRY IS A HIGHLY REGULATED INDUSTRY THAT REQUIRES CONSTANT EDUCATION ON THE CHANGING RULES INCLUDING NEW OR ENHANCED REGULATION, SUPERVISION AND OVERSIGHT ABA OFFERS OPPORTUNITIES FOR GAINING INSIGHT AND GREATER UNDERSTANDING THROUGH IN-PERSON MEETINGS, ONSITE SCHOOLS, CERTIFICATIONS AND AT-THE-DESK OFFERINGS INCLUDING TELEPHONE BRIEFINGS, WEBINARS AND INTERNET CLASSES

Form 990, Part III, Line 4b:

MEMBERSHIP RELATIONS AND COMMUNICATIONS ABA OUTREACHES TO ITS MEMBERSHIP THROUGH A NUMBER OF COMMUNICATION TOOLS INCLUDING DAILY EMAIL NEWS, WEEKLY SUMMARIES, ITS WEBSITE, AND BRIEFINGS ON THE CHANGING ADVOCACY AND REGULATORY ISSUES THESE EFFORTS FACILITATE THE DEVELOPMENT OF ABA'S POLICY POSITIONS AND PROVIDE THE MEMBERSHIP AND OTHERS WITH THE BACKGROUND AND TOOLS FOR FURTHER USE IN THEIR LOCAL COMMUNITIES

Form 990, Part III, Line 4c:

PUBLICATIONS, PRODUCTS AND SERVICES THE ABA OFFERS BOOKS, TOOL KITS, SEVERAL MAGAZINES, E-BULLETINS, AND A VARIETY OF PRODUCTS AND SERVICES IN AN EFFORT TO EDUCATE AND FACILITATE THE CONTINUED COMPLIANCE AND COMPETITIVENESS OF THE INDUSTRY IT SERVES

Form 990, Part VII - Compensation of Officers, Directors, Trustees, Key Employees, Highest Compensated Employees, and Independent Contractors										
(A) Name and Title	(B) Average hours per week (list any hours for related organizations below dotted line)	(C) Position (do not check more than one box, unless person is both an officer and a director/trustee)						(D) Reportable compensation from the organization (W- 2/1099-MISC)	(E) Reportable compensation from related organizations (W- 2/1099-MISC)	(F) Estimated amount of other compensation from the organization and related organizations
		Individual trustee or director	Institutional Trustee	Officer	Key employee	Highest compensated employee	Former			
JEFFREY M SZYPERSKI CHAIRMAN	1 00	X		X				0	0	0
LAURIE STEWART CHAIRMAN- ELECT	1 00	X		X				0	0	0
JAMES J EDWARDS JR VICE CHAIRMAN	1 00	X		X				0	0	0
LUTHER DEATON JR TREASURER	1 00	X		X				0	0	0
RICHARD M ADAMS JR BOARD MEMBER	1 00	X						0	0	0
STACEY J BENTLEY BOARD MEMBER	1 00	X						0	0	0
PEDRO A BRYANT BOARD MEMBER	1 00	X						0	0	0
KENNETH L BURGESS BOARD MEMBER	1 00	X						0	0	0
GREG D CARMICHAEL BOARD MEMBER	1 00	X						0	0	0
JILL CASTILLA BOARD MEMBER	1 00	X						0	0	0

Form 990, Part VII - Compensation of Officers, Directors, Trustees, Key Employees, Highest Compensated Employees, and Independent Contractors										
(A) Name and Title	(B) Average hours per week (list any hours for related organizations below dotted line)	(C) Position (do not check more than one box, unless person is both an officer and a director/trustee)						(D) Reportable compensation from the organization (W- 2/1099-MISC)	(E) Reportable compensation from related organizations (W- 2/1099-MISC)	(F) Estimated amount of other compensation from the organization and related organizations
		Individual trustee or director	Institutional Trustee	Officer	Key employee	Highest compensated employee	Former			
LUANNE CUNDIFF BOARD MEMBER	1 00	X						0	0	0
HOWARD M HEADLEE BOARD MEMBER	1 00	X						0	0	0
KRISTIE HOLOCH BOARD MEMBER	1 00	X						0	0	0
W WESLEY HOSKINS BOARD MEMBER	1 00	X						0	0	0
PATRICIA A HUSIC BOARD MEMBER	1 00	X						0	0	0
D BRYAN JORDAN BOARD MEMBER	1 00	X						0	0	0
BRYAN LUKE BOARD MEMBER	1 00	X						0	0	0
MATT C PACKARD BOARD MEMBER	1 00	X						0	0	0
BRADFORD C PAIGE BOARD MEMBER	1 00	X						0	0	0
DOUGLAS B PETNO BOARD MEMBER	1 00	X						0	0	0

Form 990, Part VII - Compensation of Officers, Directors, Trustees, Key Employees, Highest Compensated Employees, and Independent Contractors										
(A) Name and Title	(B) Average hours per week (list any hours for related organizations below dotted line)	(C) Position (do not check more than one box, unless person is both an officer and a director/trustee)						(D) Reportable compensation from the organization (W- 2/1099-MISC)	(E) Reportable compensation from related organizations (W- 2/1099-MISC)	(F) Estimated amount of other compensation from the organization and related organizations
		Individual trustee or director	Institutional Trustee	Officer	Key employee	Highest compensated employee	Former			
CHRISTOPHER W PINKHAM BOARD MEMBER	1 00	X						0	0	0
JAMES A REUTER BOARD MEMBER	1 00	X						0	0	0
DANIEL D ROBB BOARD MEMBER	1 00	X						0	0	0
DANIEL J SCHRIDER BOARD MEMBER	1 00	X						0	0	0
ANDREA B SMITH BOARD MEMBER	1 00	X						0	0	0
LOUISE WALKER BOARD MEMBER	1 00	X						0	0	0
PATRICIA W WEIGEL BOARD MEMBER	1 00	X						0	0	0
E PHILIP WENGER BOARD MEMBER	1 00	X						0	0	0
H MCCALL WILSON JR BOARD MEMBER	1 00	X						0	0	0
DANIEL C YATES BOARD MEMBER	1 00	X						0	0	0

Form 990, Part VII - Compensation of Officers, Directors, Trustees, Key Employees, Highest Compensated Employees, and Independent Contractors										
(A) Name and Title	(B) Average hours per week (list any hours for related organizations below dotted line)	(C) Position (do not check more than one box, unless person is both an officer and a director/trustee)						(D) Reportable compensation from the organization (W- 2/1099-MISC)	(E) Reportable compensation from related organizations (W- 2/1099-MISC)	(F) Estimated amount of other compensation from the organization and related organizations
		Individual trustee or director	Institutional Trustee	Officer	Key employee	Highest compensated employee	Former			
ROBERT S NICHOLS PRESIDENT AND CEO	36 50 1 00	X		X				2,831,782	0	314,178
ROBERT G EADY CHIEF FINANCIAL OFFICER	36 50 1 00			X				669,074	0	366,783
NAOMI CAMPER CHIEF POLICY OFFICER	37 50 1 00				X			357,143	0	44,957
PETER C COOK CHIEF COMMUNICATION OFFICER	36 50 1 00				X			483,782	0	63,667
ALETHIA BAGGETT CHIEF HR OFFICER	37 50 1 00				X			428,934	0	56,860
WAYNE ABERNATHY EXECUTIVE VICE PRESIDENT	37 50 1 00				X			950,802	0	553,647
JAMES G EDRINGTON EXECUTIVE VICE PRESIDENT	37 50 1 00				X			734,728	0	443,321
ROBERT SCHMERMUND EXECUTIVE VICE PRESIDENT	37 50 1 00				X			452,892	0	40,507
DAWN CAUSEY GENERAL COUNSEL	37 50 1 00					X		659,929	0	382,656
ROBERT R DAVIS EXECUTIVE VICE PRESIDENT	37 50 1 00					X		609,437	0	51,686

Form 990, Part VII - Compensation of Officers, Directors, Trustees, Key Employees, Highest Compensated Employees, and Independent Contractors										
(A) Name and Title	(B) Average hours per week (list any hours for related organizations below dotted line)	(C) Position (do not check more than one box, unless person is both an officer and a director/trustee)						(D) Reportable compensation from the organization (W- 2/1099-MISC)	(E) Reportable compensation from related organizations (W- 2/1099-MISC)	(F) Estimated amount of other compensation from the organization and related organizations
		Individual trustee or director	Institutional Trustee	Officer	Key employee	Highest compensated employee	Former			
JAMES BALLENTINE EXECUTIVE VICE PRESIDENT	37 50					X		509,453	0	744,587
KENNETH CLAYTON EXECUTIVE VICE PRESIDENT	37 50					X		491,547	0	670,671
JIM CHESSEN EXECUTIVE VICE PRESIDENT	37 50					X		447,827	0	746,366
JEFFREY OWEN FORMER CHIEF OPERATING OFFICER	37 50						X	427,361	0	784,574
CHRISTINE WALIKA FORMER EXECUTIVE VICE PRESIDENT	37 50						X	173,177	0	343,573
PAUL KATZ FORMER EXECUTIVE VICE PRESIDENT	37 50						X	410,769	0	52,049

SCHEDULE C
(Form 990 or 990-EZ)

Department of the Treasury
Internal Revenue Service

Political Campaign and Lobbying Activities

For Organizations Exempt From Income Tax Under section 501(c) and section 527

▶Complete if the organization is described below. ▶Attach to Form 990 or Form 990-EZ.
▶Go to www.irs.gov/Form990 for instructions and the latest information.

OMB No 1545-0047

2018

Open to Public Inspection

If the organization answered "Yes" on Form 990, Part IV, Line 3, or Form 990-EZ, Part V, line 46 (Political Campaign Activities), then

- Section 501(c)(3) organizations Complete Parts I-A and B Do not complete Part I-C
- Section 501(c) (other than section 501(c)(3)) organizations Complete Parts I-A and C below Do not complete Part I-B
- Section 527 organizations Complete Part I-A only

If the organization answered "Yes" on Form 990, Part IV, Line 4, or Form 990-EZ, Part VI, line 47 (Lobbying Activities), then

- Section 501(c)(3) organizations that have filed Form 5768 (election under section 501(h)) Complete Part II-A Do not complete Part II-B
- Section 501(c)(3) organizations that have NOT filed Form 5768 (election under section 501(h)) Complete Part II-B Do not complete Part II-A

If the organization answered "Yes" on Form 990, Part IV, Line 5 (Proxy Tax) (see separate instructions) or Form 990-EZ, Part V, line 35c (Proxy Tax) (see separate instructions), then

- Section 501(c)(4), (5), or (6) organizations Complete Part III

Name of the organization AMERICAN BANKERS ASSOCIATION	Employer identification number 52-1001304
--	---

Part I-A Complete if the organization is exempt under section 501(c) or is a section 527 organization.

1	Provide a description of the organization's direct and indirect political campaign activities in Part IV (see instructions for definition of "political campaign activities")	
2	Political campaign activity expenditures (see instructions)	▶ \$ 662,956
3	Volunteer hours for political campaign activities (see instructions)	0

Part I-B Complete if the organization is exempt under section 501(c)(3).

1	Enter the amount of any excise tax incurred by the organization under section 4955	▶ \$	
2	Enter the amount of any excise tax incurred by organization managers under section 4955	▶ \$	
3	If the organization incurred a section 4955 tax, did it file Form 4720 for this year?		☐ Yes ☐ No
4a	Was a correction made?		☐ Yes ☐ No
b	If "Yes," describe in Part IV		

Part I-C Complete if the organization is exempt under section 501(c), except section 501(c)(3).

1	Enter the amount directly expended by the filing organization for section 527 exempt function activities	▶ \$	662,956
2	Enter the amount of the filing organization's funds contributed to other organizations for section 527 exempt function activities	▶ \$	0
3	Total exempt function expenditures Add lines 1 and 2 Enter here and on Form 1120-POL, line 17b	▶ \$	662,956
4	Did the filing organization file Form 1120-POL for this year?		☒ Yes ☐ No
5	Enter the names, addresses and employer identification number (EIN) of all section 527 political organizations to which the filing organization made payments For each organization listed, enter the amount paid from the filing organization's funds Also enter the amount of political contributions received that were promptly and directly delivered to a separate political organization, such as a separate segregated fund or a political action committee (PAC) If additional space is needed, provide information in Part IV		

(a) Name	(b) Address	(c) EIN	(d) Amount paid from filing organization's funds If none, enter -0-	(e) Amount of political contributions received and promptly and directly delivered to a separate political organization If none, enter -0-
1				
2				
3				
4				
5				
6				

Part II-A Complete if the organization is exempt under section 501(c)(3) and filed Form 5768 (election under section 501(h)).

A Check ☐ if the filing organization belongs to an affiliated group (and list in Part IV each affiliated group member's name, address, EIN, expenses, and share of excess lobbying expenditures)

B Check ☐ if the filing organization checked box A and "limited control" provisions apply

Limits on Lobbying Expenditures
(The term "expenditures" means amounts paid or incurred.)**(a)** Filing
organization's
totals**(b)** Affiliated
group totals

1a Total lobbying expenditures to influence public opinion (grass roots lobbying)

b Total lobbying expenditures to influence a legislative body (direct lobbying)

c Total lobbying expenditures (add lines 1a and 1b)

d Other exempt purpose expenditures

e Total exempt purpose expenditures (add lines 1c and 1d)

f Lobbying nontaxable amount Enter the amount from the following table in both columns

If the amount on line 1e, column (a) or (b) is:	The lobbying nontaxable amount is:
Not over \$500,000	20% of the amount on line 1e
Over \$500,000 but not over \$1,000,000	\$100,000 plus 15% of the excess over \$500,000
Over \$1,000,000 but not over \$1,500,000	\$175,000 plus 10% of the excess over \$1,000,000
Over \$1,500,000 but not over \$17,000,000	\$225,000 plus 5% of the excess over \$1,500,000
Over \$17,000,000	\$1,000,000

g Grassroots nontaxable amount (enter 25% of line 1f)

h Subtract line 1g from line 1a If zero or less, enter -0-

i Subtract line 1f from line 1c If zero or less, enter -0-

j If there is an amount other than zero on either line 1h or line 1i, did the organization file Form 4720 reporting section 4911 tax for this year?

☐ **Yes** ☐ **No****4-Year Averaging Period Under section 501(h)**

(Some organizations that made a section 501(h) election do not have to complete all of the five columns below. See the separate instructions for lines 2a through 2f.)

Lobbying Expenditures During 4-Year Averaging Period

Calendar year (or fiscal year beginning in)	(a) 2015	(b) 2016	(c) 2017	(d) 2018	(e) Total
2a Lobbying nontaxable amount					
b Lobbying ceiling amount (150% of line 2a, column(e))					
c Total lobbying expenditures					
d Grassroots nontaxable amount					
e Grassroots ceiling amount (150% of line 2d, column (e))					
f Grassroots lobbying expenditures					

Part II-B Complete if the organization is exempt under section 501(c)(3) and has NOT filed Form 5768 (election under section 501(h)).

For each "Yes" response on lines 1a through 1i below, provide in Part IV a detailed description of the lobbying activity

		(a)		(b)
		Yes	No	Amount
1	During the year, did the filing organization attempt to influence foreign, national, state or local legislation, including any attempt to influence public opinion on a legislative matter or referendum, through the use of			
a	Volunteers?			
b	Paid staff or management (include compensation in expenses reported on lines 1c through 1i)?			
c	Media advertisements?			
d	Mailings to members, legislators, or the public?			
e	Publications, or published or broadcast statements?			
f	Grants to other organizations for lobbying purposes?			
g	Direct contact with legislators, their staffs, government officials, or a legislative body?			
h	Rallies, demonstrations, seminars, conventions, speeches, lectures, or any similar means?			
i	Other activities?			
j	Total. Add lines 1c through 1i			
2a	Did the activities in line 1 cause the organization to be not described in section 501(c)(3)?			
b	If "Yes," enter the amount of any tax incurred under section 4912			
c	If "Yes," enter the amount of any tax incurred by organization managers under section 4912			
d	If the filing organization incurred a section 4912 tax, did it file Form 4720 for this year?			

Part III-A Complete if the organization is exempt under section 501(c)(4), section 501(c)(5), or section 501(c)(6).

	Yes	No
1 Were substantially all (90% or more) dues received nondeductible by members?		No
2 Did the organization make only in-house lobbying expenditures of \$2,000 or less?		No
3 Did the organization agree to carry over lobbying and political expenditures from the prior year?	Yes	

Part III-B Complete if the organization is exempt under section 501(c)(4), section 501(c)(5), or section 501(c)(6) and if either (a) BOTH Part III-A, lines 1 and 2, are answered "No" OR (b) Part III-A, line 3, is answered "Yes."

1	Dues, assessments and similar amounts from members	1	44,824,540
2	Section 162(e) nondeductible lobbying and political expenditures (do not include amounts of political expenses for which the section 527(f) tax was paid).	2a	10,137,508
a	Current year	2b	-2,002,052
b	Carryover from last year	2c	8,135,456
c	Total	3	13,102,992
3	Aggregate amount reported in section 6033(e)(1)(A) notices of nondeductible section 162(e) dues	4	
4	If notices were sent and the amount on line 2c exceeds the amount on line 3, what portion of the excess does the organization agree to carryover to the reasonable estimate of nondeductible lobbying and political expenditure next year?	5	-4,967,536
5	Taxable amount of lobbying and political expenditures (see instructions)		

Part IV Supplemental Information

Provide the descriptions required for Part I-A, line 1, Part I-B, line 4, Part I-C, line 5, Part II-A (affiliated group list), Part II-A, lines 1 and 2 (see instructions), and Part II-B, line 1. Also, complete this part for any additional information.

Return Reference	Explanation
PART I-A, LINE 1	THE ORGANIZATION'S POLITICAL CAMPAIGN ACTIVITIES DURING THE TAX YEAR CONSISTED OF INDEPENDENT ADVERTISING CAMPAIGNS IN SUPPORT OF VARIOUS CANDIDATES FOR PUBLIC OFFICE
SCHEDULE C, PART III-B, LINE 1	FOR LOBBY REPORTING WE ADDED AN ADDITIONAL \$1,107,682 OF SERVICE MEMBERSHIPS WHICH IS INCLUDED IN PART VIII. LINE 2D "DUES AND FEE ARRANGEMENTS AND \$2,708,940 OF NON-DEDUCTIBLE SPECIAL ASSESSMENTS WHICH IS INCLUDED IN PART VIII, LINE 2F "ALL OTHER PROGRAM SERVICE FEE REVENUE "

SCHEDULE D
(Form 990)

Department of the Treasury
Internal Revenue Service

Supplemental Financial Statements

► Complete if the organization answered "Yes," on Form 990, Part IV, line 6, 7, 8, 9, 10, 11a, 11b, 11c, 11d, 11e, 11f, 12a, or 12b.
► Attach to Form 990.
► Go to www.irs.gov/Form990 for the latest information.

OMB No 1545-0047

2018

Open to Public Inspection

Name of the organization
AMERICAN BANKERS ASSOCIATION

Employer identification number
52-1001304

Part I Organizations Maintaining Donor Advised Funds or Other Similar Funds or Accounts.
Complete if the organization answered "Yes" on Form 990, Part IV, line 6.

	(a) Donor advised funds	(b) Funds and other accounts
1 Total number at end of year		
2 Aggregate value of contributions to (during year)		
3 Aggregate value of grants from (during year)		
4 Aggregate value at end of year		

5 Did the organization inform all donors and donor advisors in writing that the assets held in donor advised funds are the organization's property, subject to the organization's exclusive legal control?

☐ Yes ☐ No

6 Did the organization inform all grantees, donors, and donor advisors in writing that grant funds can be used only for charitable purposes and not for the benefit of the donor or donor advisor, or for any other purpose conferring impermissible private benefit?

☐ Yes ☐ No

Part II Conservation Easements. Complete if the organization answered "Yes" on Form 990, Part IV, line 7.

1 Purpose(s) of conservation easements held by the organization (check all that apply)

☐ Preservation of land for public use (e g , recreation or education)

☐ Preservation of an historically important land area

☐ Protection of natural habitat

☐ Preservation of a certified historic structure

☐ Preservation of open space

2 Complete lines 2a through 2d if the organization held a qualified conservation contribution in the form of a conservation easement on the last day of the tax year

	Held at the End of the Year
a Total number of conservation easements	2a
b Total acreage restricted by conservation easements	2b
c Number of conservation easements on a certified historic structure included in (a)	2c
d Number of conservation easements included in (c) acquired after 7/25/06, and not on a historic structure listed in the National Register	2d

3 Number of conservation easements modified, transferred, released, extinguished, or terminated by the organization during the tax year ►

4 Number of states where property subject to conservation easement is located ►

5 Does the organization have a written policy regarding the periodic monitoring, inspection, handling of violations, and enforcement of the conservation easements it holds?

☐ Yes ☐ No

6 Staff and volunteer hours devoted to monitoring, inspecting, handling of violations, and enforcing conservation easements during the year ►

7 Amount of expenses incurred in monitoring, inspecting, handling of violations, and enforcing conservation easements during the year ► \$

8 Does each conservation easement reported on line 2(d) above satisfy the requirements of section 170(h)(4)(B)(i) and section 170(h)(4)(B)(ii)?

☐ Yes ☐ No

9 In Part XIII, describe how the organization reports conservation easements in its revenue and expense statement, and balance sheet, and include, if applicable, the text of the footnote to the organization's financial statements that describes the organization's accounting for conservation easements

Part III Organizations Maintaining Collections of Art, Historical Treasures, or Other Similar Assets.
Complete if the organization answered "Yes" on Form 990, Part IV, line 8.

1a If the organization elected, as permitted under SFAS 116 (ASC 958), not to report in its revenue statement and balance sheet works of art, historical treasures, or other similar assets held for public exhibition, education, or research in furtherance of public service, provide, in Part XIII, the text of the footnote to its financial statements that describes these items

b If the organization elected, as permitted under SFAS 116 (ASC 958), to report in its revenue statement and balance sheet works of art, historical treasures, or other similar assets held for public exhibition, education, or research in furtherance of public service, provide the following amounts relating to these items

(i) Revenue included on Form 990, Part VIII, line 1

► \$

(ii) Assets included in Form 990, Part X

► \$

2 If the organization received or held works of art, historical treasures, or other similar assets for financial gain, provide the following amounts required to be reported under SFAS 116 (ASC 958) relating to these items

a Revenue included on Form 990, Part VIII, line 1

► \$

b Assets included in Form 990, Part X

► \$

Part III Organizations Maintaining Collections of Art, Historical Treasures, or Other Similar Assets (continued)

3 Using the organization's acquisition, accession, and other records, check any of the following that are a significant use of its collection items (check all that apply)

- a** ☐ Public exhibition
- b** ☐ Scholarly research
- c** ☐ Preservation for future generations
- d** ☐ Loan or exchange programs
- e** ☐ Other

4 Provide a description of the organization's collections and explain how they further the organization's exempt purpose in Part XIII

5 During the year, did the organization solicit or receive donations of art, historical treasures or other similar assets to be sold to raise funds rather than to be maintained as part of the organization's collection? ☐ Yes ☐ No

Part IV Escrow and Custodial Arrangements.

Complete if the organization answered "Yes" on Form 990, Part IV, line 9, or reported an amount on Form 990, Part X, line 21.

1a Is the organization an agent, trustee, custodian or other intermediary for contributions or other assets not included on Form 990, Part X? ☐ Yes ☐ No

b If "Yes," explain the arrangement in Part XIII and complete the following table

c Beginning balance

d Additions during the year

e Distributions during the year

f Ending balance

	Amount
1c	
1d	
1e	
1f	

2a Did the organization include an amount on Form 990, Part X, line 21, for escrow or custodial account liability? . . . ☐ Yes ☐ No

b If "Yes," explain the arrangement in Part XIII. Check here if the explanation has been provided in Part XIII ☐

Part V Endowment Funds. Complete if the organization answered "Yes" on Form 990, Part IV, line 10.

	(a) Current year	(b) Prior year	(c) Two years back	(d) Three years back	(e) Four years back
1a Beginning of year balance					
b Contributions					
c Net investment earnings, gains, and losses					
d Grants or scholarships					
e Other expenditures for facilities and programs					
f Administrative expenses					
g End of year balance					

2 Provide the estimated percentage of the current year end balance (line 1g, column (a)) held as

a Board designated or quasi-endowment ▶

b Permanent endowment ▶

c Temporarily restricted endowment ▶

The percentages on lines 2a, 2b, and 2c should equal 100%

3a Are there endowment funds not in the possession of the organization that are held and administered for the organization by

(i) unrelated organizations

(ii) related organizations

b If "Yes" on 3a(ii), are the related organizations listed as required on Schedule R?

	Yes	No
3a(i)		
3a(ii)		
3b		

4 Describe in Part XIII the intended uses of the organization's endowment funds

Part VI Land, Buildings, and Equipment.

Complete if the organization answered "Yes" on Form 990, Part IV, line 11a. See Form 990, Part X, line 10.

Description of property	(a) Cost or other basis (investment)	(b) Cost or other basis (other)	(c) Accumulated depreciation	(d) Book value
1a Land				
b Buildings				
c Leasehold improvements		11,066,342	8,753,105	2,313,237
d Equipment		6,842,742	3,670,439	3,172,303
e Other		5,440,917	4,363,218	1,077,699
Total. Add lines 1a through 1e (Column (d) must equal Form 990, Part X, column (B), line 10(c)) . . . ▶				6,563,239

Part VII

Investments—Other Securities. Complete if the organization answered "Yes" on Form 990, Part IV, line 11b.
See Form 990, Part X, line 12.

(a) Description of security or category (including name of security)	(b) Book value	(c) Method of valuation Cost or end-of-year market value
(1) Financial derivatives		
(2) Closely-held equity interests		
(3) Other _____		
(A)		
(B)		
(C)		
(D)		
(E)		
(F)		
(G)		
(H)		
Total. (Column (b) must equal Form 990, Part X, col (B) line 12) ▶		

Part VIII

Investments—Program Related.
Complete if the organization answered 'Yes' on Form 990, Part IV, line 11c. See Form 990, Part X, line 13.

(a) Description of investment	(b) Book value	(c) Method of valuation Cost or end-of-year market value
(1)		
(2)		
(3)		
(4)		
(5)		
(6)		
(7)		
(8)		
(9)		
Total. (Column (b) must equal Form 990, Part X, col (B) line 13) ▶		

Part IX

Other Assets. Complete if the organization answered 'Yes' on Form 990, Part IV, line 11d See Form 990, Part X, line 15

(a) Description	(b) Book value
(1) RECEIVABLES FROM RELATED ORGANIZATION	4,180,788
(2) LIFE INSURANCE POLICIES	27,044,538
(3) COURSEWARE DEVELOPMENT	1,108,035
(4) SECURITY DEPOSIT	57,800
(5) CASH ADVANCES	58,488
(6) METROCHECK	14,805
(7) OTHER ASSETS	75,000
(8)	
(9)	
Total. (Column (b) must equal Form 990, Part X, col (B) line 15) ▶	32,539,454

Part X

Other Liabilities. Complete if the organization answered 'Yes' on Form 990, Part IV, line 11e or 11f.
See Form 990, Part X, line 25.

1. (a) Description of liability	(b) Book value
(1) Federal income taxes	
ACCRUED PENSION LIABILITY	104,026,749
DEFERRED RENT AND LEASE INCENTIVES	6,230,746
DEFERRED COMPENSATION	5,726,760
PAYABLES TO RELATED ORGANIZATION	734,241
(5)	
(6)	
(7)	
(8)	
(9)	
Total. (Column (b) must equal Form 990, Part X, col (B) line 25) ▶	116,718,496

2. Liability for uncertain tax positions In Part XIII, provide the text of the footnote to the organization's financial statements that reports the organization's liability for uncertain tax positions under FIN 48 (ASC 740) Check here if the text of the footnote has been provided in Part XIII

☒

Part XI Reconciliation of Revenue per Audited Financial Statements With Revenue per Return

Complete if the organization answered 'Yes' on Form 990, Part IV, line 12a.

1	Total revenue, gains, and other support per audited financial statements	1	125,807,257
2	Amounts included on line 1 but not on Form 990, Part VIII, line 12		
a	Net unrealized gains (losses) on investments	2a	-11,356,657
b	Donated services and use of facilities	2b	
c	Recoveries of prior year grants	2c	
d	Other (Describe in Part XIII)	2d	2,187,733
e	Add lines 2a through 2d	2e	-9,168,924
3	Subtract line 2e from line 1	3	134,976,181
4	Amounts included on Form 990, Part VIII, line 12, but not on line 1		
a	Investment expenses not included on Form 990, Part VIII, line 7b	4a	519,839
b	Other (Describe in Part XIII)	4b	-170,917
c	Add lines 4a and 4b	4c	348,922
5	Total revenue. Add lines 3 and 4c . (This must equal Form 990, Part I, line 12)	5	135,325,103

Part XII Reconciliation of Expenses per Audited Financial Statements With Expenses per Return.

Complete if the organization answered 'Yes' on Form 990, Part IV, line 12a.

1	Total expenses and losses per audited financial statements	1	157,308,935
2	Amounts included on line 1 but not on Form 990, Part IX, line 25		
a	Donated services and use of facilities	2a	
b	Prior year adjustments	2b	
c	Other losses	2c	
d	Other (Describe in Part XIII)	2d	37,862,913
e	Add lines 2a through 2d	2e	37,862,913
3	Subtract line 2e from line 1	3	119,446,022
4	Amounts included on Form 990, Part IX, line 25, but not on line 1 :		
a	Investment expenses not included on Form 990, Part VIII, line 7b	4a	519,839
b	Other (Describe in Part XIII)	4b	
c	Add lines 4a and 4b	4c	519,839
5	Total expenses. Add lines 3 and 4c . (This must equal Form 990, Part I, line 18)	5	119,965,861

Part XIII Supplemental Information

Provide the descriptions required for Part II, lines 3, 5, and 9, Part III, lines 1a and 4, Part IV, lines 1b and 2b, Part V, line 4, Part X, line 2, Part XI, lines 2d and 4b, and Part XII, lines 2d and 4b. Also complete this part to provide any additional information.

Return Reference	Explanation
See Additional Data Table	

Part XIII Supplemental Information *(continued)*

Return Reference	Explanation

Additional Data

Software ID:
Software Version:
EIN: 52-1001304
Name: AMERICAN BANKERS ASSOCIATION

Supplemental Information

Return Reference	Explanation
PART X, LINE 2	ABA, ABASA AND BAFT ARE CLASSIFIED FOR TAX PURPOSES AS TAX-EXEMPT BUSINESS LEAGUES UNDER SECTION 501(C)(6) OF THE INTERNAL REVENUE CODE (IRC) ABACEF IS EXEMPT UNDER SECTION 501(C)(3) OF THE IRC AND IS CLASSIFIED AS AN ORGANIZATION THAT IS NOT A PRIVATE FOUNDATION THEREFORE, NO PROVISION FOR INCOME TAXES HAS BEEN PROVIDED FOR THESE ENTITIES IN THE ACCOMPANYING CONSOLIDATED FINANCIAL STATEMENTS, EXCEPT FOR THAT RESULTING FROM THE ASSOCIATION'S UNRELATED BUSINESS INCOME UNRELATED BUSINESS INCOME TAX EXPENSE WAS APPROXIMATELY \$434,000 FOR THE YEAR ENDED AUGUST 31, 2019 BANKPAC IS TAXED AT STATUTORY RATES ON ITS INVESTMENT INCOME, NET OF CERTAIN EXPENSES POLITICAL CONTRIBUTIONS RECEIVED ARE EXEMPT FROM INCOME TAXES UNDER IRC SECTION 527 BANKPAC HAD NO INCOME TAXES FOR THE YEAR ENDED AUGUST 31, 2019 CAB IS A SINGLE MEMBER LLC FOR FEDERAL AND STATE INCOME TAX PURPOSES, AND AS SUCH, IS TREATED AS A DISREGARDED ENTITY FOR INCOME TAX REPORTING PURPOSES THE FEDERAL AND STATE INCOME TAXES OF CARD ARE FILED ON A STAND-ALONE BASIS CARD HAD NO INCOME TAX EXPENSE FOR THE YEAR ENDED AUGUST 31, 2019 CBM IS A MULTI-MEMBER LLC AND FILES A DISTRICT OF COLUMBIA RETURN AND PAID THE MINIMUM TAX OF \$250 CAB IS TAXED ON ITS PROPORTIONAL SHARE OF FEDERAL INCOME REPORTED BY CBM MANAGEMENT EVALUATED THE ASSOCIATION'S TAX POSITIONS AND CONCLUDED THAT THE ASSOCIATION HAS TAKEN NO UNCERTAIN TAX POSITIONS THAT REQUIRE ADJUSTMENT TO THE CONSOLIDATED FINANCIAL STATEMENTS TO COMPLY WITH THE PROVISIONS OF THIS GUIDANCE GENERALLY, THE ASSOCIATION IS NO LONGER SUBJECT TO INCOME TAX EXAMINATIONS BY THE U S FEDERAL, STATE OR LOCAL TAX AUTHORITIES FOR YEARS BEFORE 2016

Supplemental Information	
Return Reference	Explanation
PART XI, LINE 2D - OTHER ADJUSTMENTS	ELIMINATION ENTRY BETWEEN ABA AND CAB 2,187,733

Supplemental Information	
Return Reference	Explanation
PART XI, LINE 4B - OTHER ADJUSTMENTS	COST OF GOODS SOLD REPORTED ON PART VIII LINE 10B -170,917

Supplemental Information	
Return Reference	Explanation
PART XII, LINE 2D - OTHER ADJUSTMENTS	ELIMINATION ENTRY BETWEEN ABA AND CAB 2,207,866 COST OF GOODS SOLD REPORTED ON PART VIII LINE 10B 170,917 PENSION-RELATED CHANGES OTHER THAN NET PERIODIC 35,484,130

Note: To capture the full content of this document, please select landscape mode (11" x 8.5") when printing.

Schedule I
(Form 990)

Grants and Other Assistance to Organizations,
Governments and Individuals in the United States
Complete if the organization answered "Yes," on Form 990, Part IV, line 21 or 22.
▶ Attach to Form 990.
▶ Go to www.irs.gov/Form990 for the latest information.

OMB No 1545-0047

2018

Open to Public
Inspection

Department of the
Treasury
Internal Revenue Service

Name of the organization
AMERICAN BANKERS ASSOCIATION

Employer identification number

52-1001304

Part I General Information on Grants and Assistance

- 1 Does the organization maintain records to substantiate the amount of the grants or assistance, the grantees' eligibility for the grants or assistance, and the selection criteria used to award the grants or assistance? ☒ Yes ☐ No
- 2 Describe in Part IV the organization's procedures for monitoring the use of grant funds in the United States

Part II Grants and Other Assistance to Domestic Organizations and Domestic Governments. Complete if the organization answered "Yes" on Form 990, Part IV, line 21, for any recipient that received more than \$5,000. Part II can be duplicated if additional space is needed

(a) Name and address of organization or government	(b) EIN	(c) IRC section (if applicable)	(d) Amount of cash grant	(e) Amount of non-cash assistance	(f) Method of valuation (book, FMV, appraisal, other)	(g) Description of noncash assistance	(h) Purpose of grant or assistance
(1) See Additional Data							
(2)							
(3)							
(4)							
(5)							
(6)							
(7)							
(8)							
(9)							
(10)							
(11)							
(12)							

- 2 Enter total number of section 501(c)(3) and government organizations listed in the line 1 table 9
- 3 Enter total number of other organizations listed in the line 1 table 1

Part III **Grants and Other Assistance to Domestic Individuals.** Complete if the organization answered "Yes" on Form 990, Part IV, line 22

Part III can be duplicated if additional space is needed

(a) Type of grant or assistance	(b) Number of recipients	(c) Amount of cash grant	(d) Amount of noncash assistance	(e) Method of valuation (book, FMV, appraisal, other)	(f) Description of noncash assistance
(1)					
(2)					
(3)					
(4)					
(5)					
(6)					
(7)					

Part IV **Supplemental Information.** Provide the information required in Part I, line 2; Part III, column (b); and any other additional information.

Return Reference	Explanation
PART I, LINE 2	ABA MAINTAINS RECORDS TO SUBSTANTIATE THE AMOUNT OF THE CHARITABLE CONTRIBUTIONS AS SHOWN ON PART II THE RECIPIENTS ARE SECTION 501(C)(3) ENTITIES AND ARE THUS ELIGIBLE FOR CHARITABLE CONTRIBUTIONS

Additional Data

Software ID:
Software Version:
EIN: 52-1001304
Name: AMERICAN BANKERS ASSOCIATION

Form 990, Schedule I, Part II, Grants and Other Assistance to Domestic Organizations and Domestic Governments.

(a) Name and address of organization or government	(b) EIN	(c) IRC section if applicable	(d) Amount of cash grant	(e) Amount of non-cash assistance	(f) Method of valuation (book, FMV, appraisal, other)	(g) Description of non-cash assistance	(h) Purpose of grant or assistance
GOLDEN VALLEY BANK COMMUNITY FOUNDATION 190 COHASSET ROAD CHICO, CA 95926	20-8398003	501(C)(3)	15,000				CA CAMP FIRE RELIEF DONATION
NORTH CAROLINA BANKERS ASSOCIATION FOUNDATION 3601 HAWORTH DRIVE RALEIGH, NC 27609	56-1391773	501(C)(3)	101,400				HURRICANE FLORENCE DONATION

Form 990, Schedule I, Part II, Grants and Other Assistance to Domestic Organizations and Domestic Governments.							
(a) Name and address of organization or government	(b) EIN	(c) IRC section if applicable	(d) Amount of cash grant	(e) Amount of non-cash assistance	(f) Method of valuation (book, FMV, appraisal, other)	(g) Description of non-cash assistance	(h) Purpose of grant or assistance
TRI COUNTIES BANK EMPLOYEE DISASTER FUND 63 CONSTITUTION DR CHICO, CA 95973	94-2792841		15,000				CA CAMP FIRE RELIEF DONATION
UNITED WAY BAY AREA 550 KEARNY ST STE 1000 SAN FRANCISCO, CA 94108	94-1312348	501(C)(3)	15,000				CA CAMP FIRE RELIEF DONATION

Form 990, Schedule I, Part II, Grants and Other Assistance to Domestic Organizations and Domestic Governments.							
(a) Name and address of organization or government	(b) EIN	(c) IRC section if applicable	(d) Amount of cash grant	(e) Amount of non-cash assistance	(f) Method of valuation (book, FMV, appraisal, other)	(g) Description of non-cash assistance	(h) Purpose of grant or assistance
VOLUNTEER FLORIDA FOUNDATION 3800 ESPLANADE WAY STE 180 TALLAHASSEE, FL 32311	01-0973168	501(C)(3)	100,000				HURRICANE MICHAEL DONATION
JEFFREY & DIANA OWEN SCHOLARSHIP FOR EMERGING COMMUNITY BANK LEADERS INC 1120 CONNECTICUT AVE NW WASHINGTON, DC 20036	82-3857091	501(C)(3)	50,000				SCHOLARSHIP FUND DONATION

Form 990, Schedule I, Part II, Grants and Other Assistance to Domestic Organizations and Domestic Governments.							
(a) Name and address of organization or government	(b) EIN	(c) IRC section if applicable	(d) Amount of cash grant	(e) Amount of non-cash assistance	(f) Method of valuation (book, FMV, appraisal, other)	(g) Description of non-cash assistance	(h) Purpose of grant or assistance
ST OLAF COLLEGE 1520 ST OLAF AVE NORTHFIELD, MN 55057	41-0693979	501(C)(3)	15,000				THE MARK W OLSON ENDOWED SCHOLARSHIP
NCSL FOUNDATION FOR STATE LEGISLATURES 444 N CAPITOL ST NW SUITE 515 WASHINGTON, DC 20001	74-2232576	501(C)(3)	11,197				2019 SPONSORSHIP

Form 990, Schedule I, Part II, Grants and Other Assistance to Domestic Organizations and Domestic Governments.							
(a) Name and address of organization or government	(b) EIN	(c) IRC section if applicable	(d) Amount of cash grant	(e) Amount of non-cash assistance	(f) Method of valuation (book, FMV, appraisal, other)	(g) Description of non-cash assistance	(h) Purpose of grant or assistance
NEBRASKA COMMUNITY FOUNDATION 8100 SOUTH 15TH STREET SUITE A LINCOLN, NE 68512	47-0769903	501(C)(3)	25,000				NEBRASKA FLOOD RECOVERY EFFORT
NATIONAL MULTIPLE SCLEROSIS SOCIETY 1800 M STREET NW SUITE 750 SOUTH WASHINGTON, DC 20006	13-5661935	501(C)(3)	5,290				MS WALK 2019

Schedule J
(Form 990)

Compensation Information

OMB No 1545-0047

2018

Open to Public Inspection

Department of the Treasury
Internal Revenue Service

- For certain Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees**
- ▶ **Complete if the organization answered "Yes" on Form 990, Part IV, line 23.**
▶ **Attach to Form 990.**
- ▶ **Go to www.irs.gov/Form990 for instructions and the latest information.**

Name of the organization
AMERICAN BANKERS ASSOCIATION

Employer identification number

52-1001304

Part I Questions Regarding Compensation

1a Check the appropriate box(es) if the organization provided any of the following to or for a person listed on Form 990, Part VII, Section A, line 1a. Complete Part III to provide any relevant information regarding these items

- | | |
|---|---|
| ☒ First-class or charter travel | ☐ Housing allowance or residence for personal use |
| ☒ Travel for companions | ☐ Payments for business use of personal residence |
| ☒ Tax indemnification and gross-up payments | ☒ Health or social club dues or initiation fees |
| ☐ Discretionary spending account | ☐ Personal services (e.g., maid, chauffeur, chef) |

Yes No

1b Yes

2 Yes

b If any of the boxes in line 1a are checked, did the organization follow a written policy regarding payment or reimbursement or provision of all of the expenses described above? If "No," complete Part III to explain

2 Did the organization require substantiation prior to reimbursing or allowing expenses incurred by all directors, trustees, officers, including the CEO/Executive Director, regarding the items checked in line 1a?

3 Indicate which, if any, of the following the filing organization used to establish the compensation of the organization's CEO/Executive Director. Check all that apply. Do not check any boxes for methods used by a related organization to establish compensation of the CEO/Executive Director, but explain in Part III

- | | |
|---|---|
| ☒ Compensation committee | ☐ Written employment contract |
| ☒ Independent compensation consultant | ☒ Compensation survey or study |
| ☐ Form 990 of other organizations | ☒ Approval by the board or compensation committee |

4 During the year, did any person listed on Form 990, Part VII, Section A, line 1a, with respect to the filing organization or a related organization

4a Yes

4b Yes

4c No

a Receive a severance payment or change-of-control payment?

b Participate in, or receive payment from, a supplemental nonqualified retirement plan?

c Participate in, or receive payment from, an equity-based compensation arrangement?

If "Yes" to any of lines 4a-c, list the persons and provide the applicable amounts for each item in Part III

Only 501(c)(3), 501(c)(4), and 501(c)(29) organizations must complete lines 5-9.

5 For persons listed on Form 990, Part VII, Section A, line 1a, did the organization pay or accrue any compensation contingent on the revenues of

5a

5b

a The organization?

b Any related organization?

If "Yes," on line 5a or 5b, describe in Part III

6 For persons listed on Form 990, Part VII, Section A, line 1a, did the organization pay or accrue any compensation contingent on the net earnings of

6a

6b

a The organization?

b Any related organization?

If "Yes," on line 6a or 6b, describe in Part III

7 For persons listed on Form 990, Part VII, Section A, line 1a, did the organization provide any nonfixed payments not described in lines 5 and 6? If "Yes," describe in Part III

7

8 Were any amounts reported on Form 990, Part VII, paid or accrued pursuant to a contract that was subject to the initial contract exception described in Regulations section 53.4958-4(a)(3)? If "Yes," describe in Part III

8

9 If "Yes" on line 8, did the organization also follow the rebuttable presumption procedure described in Regulations section 53.4958-6(c)?

9

For each individual whose compensation must be reported on Schedule J, report compensation from the organization on row (i) and from related organizations, described in the instructions, on row (ii). Do not list any individuals that are not listed on Form 990, Part VII.

Note. The sum of columns (B)(i)-(iii) for each listed individual must equal the total amount of Form 990, Part VII, Section A, line 1a, applicable column (D) and (E) amounts for that individual.

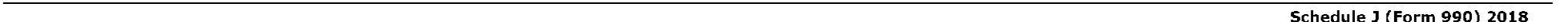
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Part III **Supplemental Information**

Provide the information, explanation, or descriptions required for Part I, lines 1a, 1b, 3, 4a, 4b, 4c, 5a, 5b, 6a, 6b, 7, and 8, and for Part II. Also complete this part for any additional information.

Return Reference	Explanation
PART I, LINE 1A	FIRST-CLASS TRAVEL & TRAVEL FOR COMPANIONS CERTAIN OFFICERS OF THE ORGANIZATION (FIVE IN TOTAL) ARE ALLOWED TO FLY FIRST CLASS AND MAY BRING A COMPANION AT THEIR DISCRETION TAX INDEMNIFICATION AND GROSS-UP PAYMENTS CERTAIN MEMBERS OF EXECUTIVE LEADERSHIP INVOLVED IN SERP'S (DESCRIBED IN 4B BELOW) HAVE VESTED BUT UNPAID AMOUNTS INCLUDED IN COMPENSATION A GROSS UP OF 12 25% OF THE TAXABLE AMOUNT IS PAID TO THE EXECUTIVE SOCIAL CLUB DUES SOCIAL CLUB DUES ARE PROVIDED FOR BUSINESS USE ONLY

Return Reference	Explanation
PART I, LINES 4A-B	PAUL KATZ RECEIVED SEVERANCE PAYMENT IN THE AMOUNT OF \$230,844 THIS IS INCLUDED IN SCHEDULE J, PART II, COLUMN B(III) THE ASSOCIATION PROVIDES NON-QUALIFIED RETIREMENT BENEFITS TO THE EXECUTIVE LEADERSHIP DESIGNED AS BENEFIT RESTORATION FOR THE QUALIFIED DEFINED BENEFIT AND DEFINED CONTRIBUTION PLANS SPONSORED BY THE ASSOCIATION THE FOLLOWING OFFICERS, KEY EMPLOYEES, AND HIGHEST COMPENSATED EMPLOYEES PARTICIPATED IN A NONQUALIFIED SUPPLEMENTAL EMPLOYEE RETIREMENT PLAN AND/OR A SUPPLEMENTAL LIFE INSURANCE PLAN WITH ACCRUED PRESENT VALUE ESTIMATED BENEFITS FOR THE YEAR - ROBERT S NICHOLS \$265,800 - ROBERT G EADY \$88,172 - NAOMI G CAMPER \$500 - PETER COOK \$20,000 - ALETHIA BAGGETT \$14,500 - WAYNE ABERNATHY \$265,468 - JAMES G EDRINGTON \$145,936 - ROBERT SCHMERMUND \$1,118 - DAWN CAUSEY \$50,144 - ROBERT R DAVIS \$4,325 - JAMES BALLENTINE \$378,600 - KENNETH CLAYTON \$162,379 - JIM CHESSEN \$178,764 FOLLOWING EMPLOYEES RECEIVED A PAYMENT FROM SUPPLEMENTAL NONQUALIFIED RETIREMENT PLAN FOR THE CALENDAR YEAR 2018 - ROBERT G EADY \$128,128 - WAYNE ABERNATHY \$205,332 - JAMES G EDRINGTON \$166,264 - ROBERT SCHMERMUND \$14,582 - DAWN CAUSEY \$161,356 - ROBERT R DAVIS \$26,775 - KENNETH CLAYTON \$97,021 - JIM CHESSEN \$9,236 - PAUL KATZ \$111,702



Additional Data

Software ID:
Software Version:
EIN: 52-1001304
Name: AMERICAN BANKERS ASSOCIATION

Form 990, Schedule J, Part II - Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees

(A) Name and Title		(B) Breakdown of W-2 and/or 1099-MISC compensation			(C) Retirement and other deferred compensation	(D) Nontaxable benefits	(E) Total of columns (B)(i)-(D)	(F) Compensation in column (B) reported as deferred on prior Form 990
		(i) Base Compensation	(ii) Bonus & incentive compensation	(iii) Other reportable compensation				
ROBERT S NICHOLS PRESIDENT AND CEO	(i)	1,739,099	1,050,000	42,683	282,300	31,878	3,145,960	0
	(ii)	0	0	0	0	0	0	0
ROBERT G EADY CHIEF FINANCIAL OFFICER	(i)	451,158	67,800	150,116	350,872	15,911	1,035,857	118,878
	(ii)	0	0	0	0	0	0	0
NAOMI CAMPER CHIEF POLICY OFFICER	(i)	334,699	19,700	2,744	17,000	27,957	402,100	0
	(ii)	0	0	0	0	0	0	0
PETER C COOK CHIEF COMMUNICATION OFFICER	(i)	398,946	81,200	3,636	36,500	27,167	547,449	0
	(ii)	0	0	0	0	0	0	0
ALETHIA BAGGETT CHIEF HR OFFICER	(i)	343,671	71,300	13,963	31,000	25,860	485,794	0
	(ii)	0	0	0	0	0	0	0
WAYNE ABERNATHY EXECUTIVE VICE PRESIDENT	(i)	590,624	119,600	240,578	519,668	33,979	1,504,449	168,032
	(ii)	0	0	0	0	0	0	0
JAMES G EDRINGTON EXECUTIVE VICE PRESIDENT	(i)	447,724	90,300	196,704	410,736	32,585	1,178,049	103,877
	(ii)	0	0	0	0	0	0	0
ROBERT SCHMERMUND EXECUTIVE VICE PRESIDENT	(i)	356,913	72,400	23,579	17,618	22,889	493,399	17,486
	(ii)	0	0	0	0	0	0	0
DAWN CAUSEY GENERAL COUNSEL	(i)	409,352	61,900	188,677	359,344	23,312	1,042,585	144,550
	(ii)	0	0	0	0	0	0	0
ROBERT R DAVIS EXECUTIVE VICE PRESIDENT	(i)	490,099	74,700	44,638	20,825	30,861	661,123	27,679
	(ii)	0	0	0	0	0	0	0
JAMES BALLENTINE EXECUTIVE VICE PRESIDENT	(i)	420,345	85,000	4,108	716,900	27,687	1,254,040	0
	(ii)	0	0	0	0	0	0	0
KENNETH CLAYTON EXECUTIVE VICE PRESIDENT	(i)	326,436	51,000	114,111	641,779	28,892	1,162,218	119,736
	(ii)	0	0	0	0	0	0	0
JIM CHESSEN EXECUTIVE VICE PRESIDENT	(i)	366,664	55,700	25,463	722,364	24,002	1,194,193	0
	(ii)	0	0	0	0	0	0	0
JEFFREY OWEN FORMER CHIEF OPERATING OFFICER	(i)	111,290	0	316,071	784,574	0	1,211,935	0
	(ii)	0	0	0	0	0	0	0
CHRISTINE WALIKA FORMER EXECUTIVE VICE PRESIDENT	(i)	135,388	0	37,789	343,573	0	516,750	0
	(ii)	0	0	0	0	0	0	0
PAUL KATZ FORMER EXECUTIVE VICE PRESIDENT	(i)	38,781	0	371,988	52,049	0	462,818	88,266
	(ii)	0	0	0	0	0	0	0

SCHEDULE O
(Form 990 or 990-EZ)

Department of the Treasury

Name of the organization

AMERICAN BANKERS ASSOCIATION

Supplemental Information to Form 990 or 990-EZ

Complete to provide information for responses to specific questions on Form 990 or 990-EZ or to provide any additional information.

▶ Attach to Form 990 or 990-EZ.

▶ Go to www.irs.gov/Form990 for the latest information.

OMB No 1545-0047

2018

Open to Public Inspection

Employer identification number

52-1001304

990 Schedule O, Supplemental Information

Return Reference	Explanation
FORM 990, PART VI, SECTION A, LINE 6	THE AMERICAN BANKERS ASSOCIATION (ABA) IS A 501(C)(6) NONPROFIT BUSINESS LEAGUE INCORPORATED IN THE DISTRICT OF COLUMBIA ITS MEMBERSHIP IS COMPOSED OF NATIONAL BANKS, STATE-CHARTERED BANKS, SAVINGS BANKS, SAVINGS AND LOAN ASSOCIATIONS, TRUST COMPANIES, AND OTHER BANKING ENTITIES SITUATED WITHIN THE UNITED STATES AND ITS DEPENDENCIES, THAT HAVE FILED AN APPLICATION FOR FEDERAL DEPOSIT INSURANCE CORPORATION INSURANCE OF ACCOUNTS ("REGULAR MEMBERS")

990 Schedule O, Supplemental Information

Return Reference	Explanation
FORM 990, PART VI, SECTION A, LINE 7A	MEMBERS OF THE ABA ANNUALLY ELECT THE ORGANIZATION'S OFFICERS AND BOARD OF DIRECTORS, WHICH ACTS AS THE ASSOCIATION'S GOVERNING BODY

990 Schedule O, Supplemental Information

Return Reference	Explanation
FORM 990, PART VI, SECTION A, LINE 7B	IN ADDITION TO THE ANNUAL ELECTIONS, MEMBERS VOTE ON MAJOR CORPORATE ACTIONS SUCH AS A MER GER OR ACQUISITION AND IN THE EVENT OF A POSSIBLE DISSOLUTION

990 Schedule O, Supplemental Information

Return Reference	Explanation
FORM 990, PART VI, SECTION B, LINE 11B	ABA'S MANAGEMENT, WHICH INCLUDES CERTIFIED PUBLIC ACCOUNTANTS, CONDUCTED SEVERAL INTERNAL REVIEWS OF THE FORM 990 RETURN PREPARED BY OUTSIDE ACCOUNTING FIRM A COPY OF THE FORM 990 INCLUDING ALL REQUIRED SCHEDULES WAS PROVIDED TO THE AUDIT COMMITTEE OF THE ABA IN ELECTRONIC FORM PRIOR TO ITS FILING WITH THE IRS PER ABA BOARD ADOPTED POLICY, THE AUDIT COMMITTEE WAS DELEGATED THE RESPONSIBILITY FOR REVIEWING THE TAX RETURN IN ADVANCE OF ITS FILING THE AUDIT COMMITTEE REPORTS TO THE ASSOCIATION'S GOVERNING BODY AND IS COMPRISED OF BOARD OF DIRECTOR MEMBERS

990 Schedule O, Supplemental Information

Return Reference	Explanation
FORM 990, PART VI, SECTION B, LINE 12C	ABA MONITORS AND ENFORCES ITS CONFLICTS OF INTEREST POLICY BY, AT LEAST ANNUALLY, HAVING EACH OFFICER, MEMBER OF THE BOARD OF DIRECTORS, AND ALL EMPLOYEES ATTEST BY SIGNATURE THAT THEY HAVE READ, UNDERSTAND, AND ARE IN COMPLIANCE WITH THE POLICY ON AN ANNUAL BASIS, THE BOARD IS PROVIDED A COPY OF THE POLICY, OFFERED AN OPPORTUNITY TO DISCUSS ITS REQUIREMENTS, AND HAVE ANY QUESTIONS ANSWERED STAFF ATTENDS THE MEETINGS OF THE BOARD IN ORDER TO MONITOR COMPLIANCE WITH THE REQUIREMENTS AND THAT THE MINUTES OF THE MEETINGS FAIRLY REPRESENT THE DISCUSSIONS OF THE BOARD

990 Schedule O, Supplemental Information

Return Reference	Explanation
FORM 990, PART VI, SECTION B, LINE 15	ABA'S COMPENSATION COMMITTEE, COMPRISED OF BOARD OF DIRECTOR MEMBERS, IS RESPONSIBLE FOR REVIEWING THE COMPENSATION OF THE ASSOCIATION'S CEO, ITS OTHER OFFICERS AND ITS KEY EMPLOYEES AND MAKES THE FINAL COMPENSATION RECOMMENDATION TO THE BOARD OF DIRECTORS, WHICH HAS FINAL APPROVAL THE PROCESS USED BY THE COMPENSATION COMMITTEE IS MADE IN CONJUNCTION WITH AN OUTSIDE INDEPENDENT CONSULTING FIRM THAT CONDUCTED A COMPREHENSIVE COMPENSATION STUDY FOR THE ASSOCIATION THE METHODOLOGY USED INCLUDED THE FOLLOWING - UTILIZING SALARY SURVEYS, INCLUDING THOSE FROM MERCER, WATSON WYATT, PRM CONSULTING, QUATT ASSOCIATES AND ASAE, JOBS WERE BENCHMARKED TO COMPARABLE POSITIONS - THE OUTSIDE COMPENSATION CONSULTING FIRM REVIEWED APPLICABLE MARKET DATA AND THE BENCHMARKED POSITION INFORMATION AND DEVELOPED A MARKET-BASED PAY STRUCTURE - ADDITIONAL FACTORS CONSIDERED WERE POSITION REQUIREMENTS, ORGANIZATIONAL IMPACT, AND JOB COMPLEXITY - MINUTES ARE KEPT OF THE COMPENSATION COMMITTEE'S DELIBERATIONS AND DECISIONS REGARDING COMPENSATION ARRANGEMENTS

990 Schedule O, Supplemental Information

Return Reference	Explanation
FORM 990, PART VI, SECTION C, LINE 19	ABA DOES NOT MAKE ITS GOVERNING DOCUMENTS, CONFLICT OF INTEREST POLICY, OR ITS FINANCIAL STATEMENTS AVAILABLE TO THE PUBLIC THE ORGANIZATION'S FORM 990 IS AVAILABLE FOR PUBLIC INSPECTION UPON REQUEST

990 Schedule O, Supplemental Information

Return Reference	Explanation
FORM 990, PART IX, LINE 11G	CONSULTANT 7,765,935 OUTSIDE SERVICES 6,067,079

990 Schedule O, Supplemental Information

Return Reference	Explanation
FORM 990, PART XI, LINE 9	PENSION-RELATED CHANGES OTHER THAN NET PERIODIC BENEFIT COSTS -35,484,130

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As Filed Data -

DLN: 93493194000040

SCHEDULE R
(Form 990)

Department of the Treasury
Internal Revenue Service

Related Organizations and Unrelated Partnerships

▶ Complete if the organization answered "Yes" on Form 990, Part IV, line 33, 34, 35b, 36, or 37.
▶ Attach to Form 990.
▶ Go to www.irs.gov/Form990 for instructions and the latest information.

OMB No 1545-0047

2018

Open to Public Inspection

Name of the organization
AMERICAN BANKERS ASSOCIATION

Employer identification number
52-1001304

Part I Identification of Disregarded Entities

Complete if the organization answered "Yes" on Form 990, Part IV, line 33.

(a) Name, address, and EIN (if applicable) of disregarded entity	(b) Primary activity	(c) Legal domicile (state or foreign country)	(d) Total income	(e) End-of-year assets	(f) Direct controlling entity
(1) CORPORATION FOR AMERICAN BANKING LLC 1120 CONNECTICUT AVE NW WASHINGTON, DC 20036 84-1724126	MARKETING	DE	3,777,472	10,678,919	AMERICAN BANKERS ASSOCIATION

Part II Identification of Related Tax-Exempt Organizations

Complete if the organization answered "Yes" on Form 990, Part IV, line 34 because it had one or more related tax-exempt organizations during the tax year.

(a) Name, address, and EIN of related organization	(b) Primary activity	(c) Legal domicile (state or foreign country)	(d) Exempt Code section	(e) Public charity status (if section 501(c)(3))	(f) Direct controlling entity	(g) Section 512 (b)(13) controlled entity?	
						Yes	No
(1)ABA COMMUNITY ENGAGEMENT FOUNDATION 1120 CONNECTICUT AVE NW WASHINGTON, DC 20036 83-0397856	EDUCATION	DC	501(C)(3)	LINE 12A, I	AMERICAN BANKERS ASSOCIATION	Yes	
(2)ABA SECURITIES ASSOCIATION 1120 CONNECTICUT AVE NW WASHINGTON, DC 20036 52-1935145	ADVOCACY	DE	501(C)(6)		AMERICAN BANKERS ASSOCIATION	Yes	
(3)BAFT INC 1120 CONNECTICUT AVE NW WASHINGTON, DC 20036 11-3642835	EDUCATION, ADVOCACY	DE	501(C)(6)		AMERICAN BANKERS ASSOCIATION	Yes	
(4)INTERNATIONAL MONETARY CONFERENCE 1120 CONNECTICUT AVE NW WASHINGTON, DC 20036 23-7244320	INTERNATIONAL BANKING	DC	501(C)(6)		N/A		No
(5)ABA VEB 1120 CONNECTICUT AVE NW WASHINGTON, DC 20036 52-1767808	RETIREE BENEFITS	DC	501(C)(9)		AMERICAN BANKERS ASSOCIATION	Yes	
(6)JEFFREY AND DIANA OWEN SCHOLARSHIP FOR EMERGING COMMUNITY BANK LEADERS INC 1120 CONNECTICUT AVE NW WASHINGTON, DC 20036 82-3857091	EDUCATIONAL ACTIVITIES	DC	501(C)(3)	LINE 12A, I	AMERICAN BANKERS ASSOCIATION	Yes	

Part III Identification of Related Organizations Taxable as a Partnership Complete if the organization answered "Yes" on Form 990, Part IV, line 34 because it had one or more related organizations treated as a partnership during the tax year.

(a) Name, address, and EIN of related organization	(b) Primary activity	(c) Legal domicile (state or foreign country)	(d) Direct controlling entity	(e) Predominant income(related, unrelated, excluded from tax under sections 512- 514)	(f) Share of total income	(g) Share of end-of-year assets	(h) Disproportionate allocations?		(i) Code V-UBI amount in box 20 of Schedule K-1 (Form 1065)	(j) General or managing partner?		(k) Percentage ownership
							Yes	No		Yes	No	
(1) COMMUNITY BANK MORTGAGE LLC 1120 CONNECTICUT AVE NW WASHINGTON, DC 20036 84-1717504	SECONDARY MORTGAGE	DE	CAB	UNRELATED	-28,130	86,434		No	-28,130		No	50 000 %

Part IV Identification of Related Organizations Taxable as a Corporation or Trust Complete if the organization answered "Yes" on Form 990, Part IV, line 34 because it had one or more related organizations treated as a corporation or trust during the tax year.

(a) Name, address, and EIN of related organization	(b) Primary activity	(c) Legal domicile (state or foreign country)	(d) Direct controlling entity	(e) Type of entity (C corp, S corp, or trust)	(f) Share of total income	(g) Share of end-of- year assets	(h) Percentage ownership	(i) Section 512 (b)(13) controlled entity?	
								Yes	No
(1) ABA CARD SOLUTIONS INC 1120 CONNECTICUT AVE NW WASHINGTON, DC 20036 36-3515025	BUSINESS SERVICES	DE	CORPORATION FOR AMERICA BANKING	C	1,261,268	8,127,451	100 000 %	Yes	

Part V Transactions With Related Organizations Complete if the organization answered "Yes" on Form 990, Part IV, line 34, 35b, or 36.

Note. Complete line 1 if any entity is listed in Parts II, III, or IV of this schedule

1 During the tax year, did the organization engage in any of the following transactions with one or more related organizations listed in Parts II-IV?

a Receipt of (i) interest, (ii)annuities, (iii) royalties, or(iv) rent from a controlled entity

1a

No

b Gift, grant, or capital contribution to related organization(s)

1b

No

c Gift, grant, or capital contribution from related organization(s)

1c

No

d Loans or loan guarantees to or for related organization(s)

1d

No

e Loans or loan guarantees by related organization(s)

1e

No

f Dividends from related organization(s)

1f

No

g Sale of assets to related organization(s)

1g

No

h Purchase of assets from related organization(s)

1h

No

i Exchange of assets with related organization(s)

1i

No

j Lease of facilities, equipment, or other assets to related organization(s)

1j

No

k Lease of facilities, equipment, or other assets from related organization(s)

1k

No

l Performance of services or membership or fundraising solicitations for related organization(s)

1l

No

m Performance of services or membership or fundraising solicitations by related organization(s)

1m

No

n Sharing of facilities, equipment, mailing lists, or other assets with related organization(s)

1n

Yes

o Sharing of paid employees with related organization(s)

1o

Yes

p Reimbursement paid to related organization(s) for expenses

1p

No

q Reimbursement paid by related organization(s) for expenses

1q

Yes

r Other transfer of cash or property to related organization(s)

1r

No

s Other transfer of cash or property from related organization(s)

1s

Yes

2 If the answer to any of the above is "Yes," see the instructions for information on who must complete this line, including covered relationships and transaction thresholds

See Additional Data Table

(a) Name of related organization	(b) Transaction type (a-s)	(c) Amount involved	(d) Method of determining amount involved

Provide the following information for each entity taxed as a partnership through which the organization conducted more than five percent of its activities (measured by total assets or gross revenue) that was not a related organization. See instructions regarding exclusion for certain investment partnerships.

[illegible]

Part VII **Supplemental Information**

Provide additional information for responses to questions on Schedule R (see instructions)

Return Reference	Explanation

Additional Data

Software ID:
Software Version:
EIN: 52-1001304
Name: AMERICAN BANKERS ASSOCIATION

Form 990, Schedule R, Part V - Transactions With Related Organizations

(a) Name of related organization		(b) Transaction type(a-s)	(c) Amount Involved	(d) Method of determining amount involved
(1)	ABA COMMUNITY ENGAGEMENT FOUNDATION (83-0397856)	N	75,799	ALLOCATION
(1)	ABA COMMUNITY ENGAGEMENT FOUNDATION (83-0397856)	O	398,932	ALLOCATION
(2)	ABA COMMUNITY ENGAGEMENT FOUNDATION (83-0397856)	Q	731,109	ACTUAL/CASH
(3)	ABA SECURITIES ASSOCIATION (52-1935145)	N	29,154	ALLOCATION
(4)	ABA SECURITIES ASSOCIATION (52-1935145)	O	297,949	ALLOCATION
(5)	ABA SECURITIES ASSOCIATION (52-1935145)	Q	498,670	ACTUAL/CASH
(6)	ABA SECURITIES ASSOCIATION (52-1935145)	S	437,000	ACTUAL/CASH
(7)	BAFT INC (11-3642835)	N	291,535	ALLOCATION
(8)	BAFT INC (11-3642835)	O	2,299,824	ALLOCATION
(9)	BAFT INC (11-3642835)	Q	4,402,843	ACTUAL/CASH
(10)	BAFT INC (11-3642835)	S	4,399,284	ACTUAL/CASH
(11)	INTERNATIONAL MONETARY CONFERENCE (23-7244320)	N	76,239	ALLOCATION
(12)	INTERNATIONAL MONETARY CONFERENCE (23-7244320)	O	163,649	ALLOCATION
(13)	INTERNATIONAL MONETARY CONFERENCE (23-7244320)	Q	843,821	ACTUAL/CASH
(14)	ABA CARD SOLUTIONS INC (36-3515025)	N	55,432	ALLOCATION
(15)	ABA CARD SOLUTIONS INC (36-3515025)	O	209,402	ALLOCATION
(16)	ABA CARD SOLUTIONS INC (36-3515025)	Q	679,373	ACTUAL/CASH
(17)	COMMUNITY BANK MORTGAGE LLC (84-1717504)	N	9,896	ALLOCATION
(18)	COMMUNITY BANK MORTGAGE LLC (84-1717504)	O	37,788	ALLOCATION
(19)	COMMUNITY BANK MORTGAGE LLC (84-1717504)	Q	88,921	ACTUAL/CASH
(20)	ABA VEBA (52-1767808)	Q	2,783,938	ACCRUAL