



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

May 1, 1997

Milt Kirkland Walters, Treasurer
Union Planters Corporation Committee
On Government Affairs
7130 Goodlett Farms Parkway
Cordova, TN 38018

Identification Number: C00044024

Reference: 30 Day Post-General Report (10/17/96-11/25/96)

Dear Mr. Walters:

On April 9, 1997 you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your April 15, 1997 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.

-The Commission acknowledges your response concerning the transfer of \$16,214.23 from Mid South Tennessee Committee on Government Affairs; however it still appears that your committee has received impermissible funds into your federal account. As you indicate in your response, Mid South Tennessee Committee is a State/local PAC for Leader Federal Savings PAC and does not appear to be registered with the Commission. This transfer of non-federal funds into the federal account of your Committee is prohibited. 11 CFR §102.5(a)(1)(i).

You should either create a non-federal account for your Committee and transfer the impermissible funds into that account or refund the total amount back to Mid South Tennessee Committee on Government Affairs. Transfers and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period in which the transaction was made. Please immediately inform the Commission of your corrective

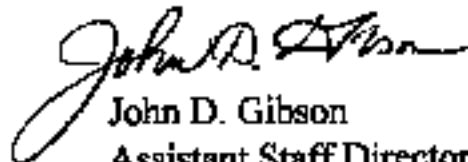
action in writing and provide a photocopy of your check for the transfer-out or refund.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amount will be taken into consideration.

If this information is not received by the Commission within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Neil Evans on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

A handwritten signature in cursive script that reads "John D. Gibson". The signature is written in black ink and is positioned above the printed name and title.

John D. Gibson
Assistant Staff Director
Reports Analysis Division

