

UNION PLANTERS COMMITTEE ON GOVERNMENT AFFAIRS
PO BOX 387
MEMPHIS, TN 38147

RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM

MAY 8 12 41 PM '97

Mr. John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Identification Number: C00044024

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

Dear Mr. Gibson:

Enclosed is a photocopy of our PAC check number 0484 in the amount of \$16,214.23 payable to Union Planters Committee on Government Affairs - State and Local. This represents a full refund of the amount received in October 1996 from Mid South Tennessee Committee on Government Affairs, a nonfederal PAC.

In accordance with my conversation with Mr. Neil Evans of your office, we will report the \$16,214.23 on Line 29 (other disbursements) of the Detailed Summary Page of FEC Form 3X on our July 15 Quarterly Report.

I hope this satisfactorily resolves the issue.

Sincerely,



M. Kirk Walters
Treasurer

0484

26-B/240

May 6 19 97

PAY TO THE ORDER OF Union Planters Committee on Government Affairs - State & Local \$ 16,214.23

Sixteen Thousand Two Hundred Fourteen Dollars & 23/100----- DOLLARS

UNION PLANTERS BANK MEMPHIS, TENNESSEE

UNION PLANTERS COMMITTEE ON GOVERNMENT AFFAIRS

FOR UPC PAC ID#1167

M. Keith Walker *Bill Ray*

⑆000484⑆ ⑆084000084⑆ 01-0731056⑆



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

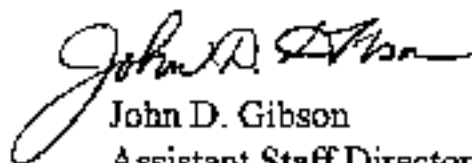
action in writing and provide a photocopy of your check for the transfer-out or refund.

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

Federal Election Commission
**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

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DATE OF RECEIPT

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5-8-97

Registered/Certified Mail

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Records

DATE OF RECEIPT

Other (Specify):

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and/or DATE OF RECEIPT

SCB
PREPARER

5-9-97
DATE PREPARED