



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

C. Edward Jordan Jr., Treasurer
Commerce Bancorp Inc. - Political
Action Committee Fed
1701 Route 70 East
Cherry Hill, NJ 08034

MAR 15 2000

Identification Number: C00303156

Reference: Amended Mid-Year Report (1/1/99-6/30/99), received 2/15/00

Dear Mr. Jordan:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

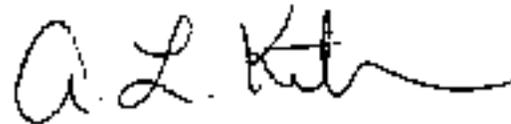
-You state the contributions of 8/15/97 for \$1,000 and 12/4/97 for \$4,000 should be re-designated for the 1996 General Election. However, the funds were redesignated after the 1996 General Election date of 11/5/1996. Please note that contributions may not be redesignated for an election that has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign. If the candidate does not have net debts outstanding from the 1996 General Election, you need to request a refund of the excessive contribution amount. Please clarify the corrective action taken by your committee and amend the appropriate report(s) as necessary.

-On item A of Schedule C, your committee lists itself (Commerce Bancorp, Inc. Political Action Committee-FED) as the loan source. Please clarify the nature of this transaction or amend Schedule C by providing the correct name and mailing address of the entity receiving the loan.

-For future reporting, please be advised that only the amounts applied toward the principal amount of a loan should be included in the Cumulative Payment-to-Date box on Schedule C. Those payments should also be reported on Schedule B supporting Line 26 of the Detailed Summary Page. Interest payments should be disclosed on Schedule B supporting Line 21(b), as operating expenditures, in accordance with 11 CFR §104.3.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

A handwritten signature in cursive script that reads "A. L. Kitchen". The signature is written in black ink and is positioned above the typed name.

Antoinette Kitchen
Reports Analyst
Reports Analysis Division

