



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

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

DEC 22 1999

Identification Number: C00044024

Reference: October Quarterly Report (7/1/99-9/30/99)

Dear Mr. Walters:

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:

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of \$5,000 and/or notify the recipient in writing of your redesignation of the contribution. In the best interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the recipient

committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-You must attempt to obtain the full name, mailing address, occupation and name of employer for all individuals who contribute more than \$200 in a calendar year. Please amend your report to include the omitted information.

A committee may establish "best efforts" by providing the Commission with a description of its procedures for requesting the information. It is also in the best interests of the committee to provide a copy of its solicitation. In order to establish "best efforts", the committee must demonstrate that it makes at least one request for the information after the contribution is received. This one request must be made for any solicited or unsolicited contribution that, in the aggregate, exceeds the \$200 threshold and lacks the necessary information.

Each solicitation must include a clear and conspicuous request for the information. If a committee receives a contribution that, in the aggregate, exceeds the \$200 threshold but lacks contributor information, the committee must, within 30 days, make a written or oral request for the information. Please note that a written request may not include an additional solicitation or material on any other subject, other than thanking the contributor for the donation, and must include a pre-addressed return post card or envelope for the contributor's response. An oral request must be documented in writing. Committees must also disclose information that was not provided by the contributor, but is available in any of the committee's records for that current election cycle.

If a committee receives contributor information after the contributions have been reported, the committee shall either a) file with its next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before its next regularly scheduled reporting date, amendments to the report(s)

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originally disclosing the contribution(s). (11 CFR §104.3(a)(4)(i) and 11 CFR § 104.7)

-The total listed on Line 11(a)(ii), Column B of the Detailed Summary Page appears to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B total. Please amend your report and any subsequent reports that may be affected by this correction.

-Schedule A supporting Line 11(a)(i) of your report discloses contributions received through what appears to be a payroll deduction plan. Please amend your report to disclose the frequency of the deduction. 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

-It has come to the attention of the Federal Election Commission that the reports you have filed during the current election cycle do not reflect the appropriate coverage dates for quarterly filing status. Please be advised of the filing dates and coverage periods for the 1999-2000 election cycle and fill in the appropriate dates on Line 5 of the Summary Page.

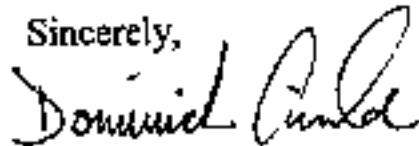
Report Type	Coverage Dates	Due Date
Mid-Year	1/1/99-6/30/99	July 31, 1999
Year End	7/1/99-12/31/99	January 31, 2000
April Quarterly	1/1/00-3/31/00	April 15, 2000
July Quarterly	4/1/00-6/30/00	July 15, 2000
October Quarterly	7/1/00-9/30/00	October 15, 2000
12 Day Pre-General	10/1/00-10/18/00	October 26, 2000
30 Day Post-General	10/19/98-11/27/00	December 7, 2000
Year End	11/28/00-12/31/00	January 31, 2001

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

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toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,



Dominick Ciaraldi
Reports Analyst
Reports Analysis Division

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Any information copied from such reports and statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
UNION PLANTERS CORP COMMITTEE ON GOVNT AFFAIRS

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Full Name, Mailing Address and Zip Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
ERIST FOR US SENATE 4205 HILLSBORO ROAD SUITE 30E Nashville, TN 37215-3336	POLITICAL CONTRIBUTION Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	08/10/99	\$1000.00
US SENATOR MITCH MCCONNELL COMMITTEE 7025 BLANDVILLE RD HWY 62 Paducah, KY 42003-	POLITICAL CONTRIBUTION Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	07/27/99	\$1000.00
Full Name, Mailing Address and Zip Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	/ /	Amount of Each Disbursement This Period
Full Name, Mailing Address and Zip Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	/ /	Amount of Each Disbursement This Period
Full Name, Mailing Address and Zip Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	/ /	Amount of Each Disbursement This Period
Full Name, Mailing Address and Zip Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	/ /	Amount of Each Disbursement This Period
Full Name, Mailing Address and Zip Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	/ /	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)	\$2000.00
TOTAL This Period (last page this line number only)	\$2000.00

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
Union Planters Corp Committee on Govnt Affairs

Full Name, Mailing Address and Zip Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
MISSOURIANS FOR KIT BOND 34 N. BRENTWOOD BLVD SUITE 14 Saint Louis, MO 63105-	POLITICAL CONTRIBUTION Disbursement for: <input type="checkbox"/> Salary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/27/98	\$150.00
FRIST 2000, INC 4205 HILLSBORO ROAD SUITE 106 Nashville, TN 37215-	POLITICAL COMMITTEE Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/04/98	\$3000.00
PRICE FOR CONGRESS 6205 W. MAIN Belleville, IL 62223-	POLITICAL CONTRIBUTION Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/04/98	\$500.00
		/ /	
		/ /	
		/ /	
		/ /	

SUBTOTAL of Disbursements This Page (optional)	\$3650.00
TOTAL This Period (last page this line number only)	\$3650.00

SCHEDULE B

ITEMIZED DISBURSEMENTS

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NAME OF COMMITTEE (in Full)

Union Planters Corporation Committee on Government Affairs PAC ID#1167

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95030160860

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Ed Bryant for Congress P.O. Box 770427 Memphis, TN 38119	Political Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-22-95	1,000.00
Bill Frist for US Senate 3823 Central Avenue Memphis, TN 38103	Political Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-14-95	1,000.00
Tennesseans for Thompson 1508 West End Ave Suite 901 Nashville, TN 37203	Political Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-20-95	1,000.00
Friends of Larry Presslar P.O. Box 77166 Washington, DC 20013	Political Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	12-7-95	1,000.00
Steve Owens for Congress P.O. Box 8129 Scottsdale, AZ 75252	Political Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	12-7-95	250.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)	4,250.00
TOTAL This Period (last page this line number only)	4,250.00

PAYROLL DEDUCTIONS

SCHEDULE A		ITEMIZED RECEIPTS		USE SEPARATE SCHEDULES TO REPORT CONTRIBUTIONS TO THE DOMESTIC SAVING PLAN PAGE	PAGE	OF
Contributions from Individuals				FOR LINE NUMBER		11(a)(1)
Any information shown here from Form 1099-RC and Form 1099-DIV may not be used to claim an itemized deduction for any purpose of avoiding contributions or to determine deductibility other than using the name and address of any domestic committee to which contributions were made.						
NAME OF COMMITTEE (in full)		National Organization PAC 000000001				
A. Full Name, Mailing Address and ZIP Code		Name of Employer		Date received (see note)	Amount of Cash Receipt (see note)	
Anne Sullivan 21 18th Street City, State ZIP		National Organization, Inc.		payroll deduction	\$72.00	
Member for _____ Party _____		Position		Branch Manager	(\$12 biweekly)	
Other address _____		Aggregate Year-to-Date >		228.00		
B. Full Name, Mailing Address and ZIP Code		Name of Employer		Date received (see note)	Amount of Cash Receipt (see note)	
Rodney Jones 551 Hamden Road City, State ZIP		National Organization, Inc.		payroll deduction	\$120.00	
Member for _____ Party _____		Position		Vice President	(\$20 biweekly)	
Other address _____		Aggregate Year-to-Date >		380.00		

Itemize payroll deductions only after they have exceeded \$200 per calendar year from an individual.

Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the donor's paychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, write "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor. 104.8(b).

EXAMPLE: During an election year, a corporate manager authorizes her employer to deduct \$12 per pay period (each pay period is two weeks for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's contributions as "unitemized contributions" in its April and July quarterly reports. By June 30, the closing date for the July report, the manager's aggregate contributions are \$185 — still below the \$200 itemization threshold. By September 30 — the closing date for the October quarterly report — the manager's contributions reach \$228. Therefore, the committee itemizes the total contributions received from the manager during the third quarter (\$120), providing the year-to-date total in the appropriate space. (See item A in the illustration above.)

IN-KIND CONTRIBUTIONS

SCHEDULE A		ITEMIZED RECEIPTS		USE SEPARATE SCHEDULES TO REPORT CONTRIBUTIONS TO THE DOMESTIC SAVING PLAN PAGE	PAGE	OF
Contributions from Individuals				FOR LINE NUMBER		11(a)(1)
Any information shown here from Form 1099-RC and Form 1099-DIV may not be used to claim an itemized deduction for any purpose of avoiding contributions or to determine deductibility other than using the name and address of any domestic committee to which contributions were made.						
NAME OF COMMITTEE (in full)		National Organization PAC 000000001				
A. Full Name, Mailing Address and ZIP Code		Name of Employer		Date received (see note)	Amount of Cash Receipt (see note)	
Martin L. Evans 4 River Road City, State ZIP		National Organization, Inc.		8/19/92	\$3,000.00 (IN-KIND)	
Member for _____ Party _____		Position		Chairman	(\$1500 PRIZE)	
Other address _____		Aggregate Year-to-Date >		3,000.00		

In-Kind Contributions

When determining whether to itemize an in-kind contribution, follow the same guidelines listed above under "When to Itemize Receipts." See Chapter 2 for information on how to determine the dollar value of an in-kind contribution.

In addition, add the value of the in-kind contribution to the operating expenditures total on Line 21(b) (in order to avoid inflating the cash-on-hand amount). 104.13(a)(2).

If the in-kind contribution must be itemized on Schedule A, then it must also be itemized on a Schedule B for operating expenditures. See the illustration at right.

Appreciated Goods

When a committee receives an in-kind contribution whose value may

SCHEDULE B		ITEMIZED DISBURSEMENTS		USE SEPARATE SCHEDULES TO REPORT CONTRIBUTIONS TO THE DOMESTIC SAVING PLAN PAGE	PAGE	OF
Operating Expenditures/Other Federal				FOR LINE NUMBER		21(b)
Any information shown here from Form 1099-RC and Form 1099-DIV may not be used to claim an itemized deduction for any purpose of avoiding contributions or to determine deductibility other than using the name and address of any domestic committee to which expenditures were made.						
NAME OF COMMITTEE (in full)		National Organization PAC 000000001				
A. Full Name, Mailing Address and ZIP Code		Type of Disbursement		Date received (see note)	Amount of Cash Disbursement (see note)	
Martin L. Evans 4 River Road City, State ZIP		raffle prize		8/19/92	\$3,000.00 (IN-KIND CONTRIBUTION)	
Other address _____		Disbursement to _____ Party _____				

Itemize in-kind contributions on both Schedules A and B so as not to inflate the cash-on-hand amount.

