



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

Identification Number: C00044024

DEC 22 1999

Reference: April Quarterly Report (1/1/99-3/31/99)

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:

-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.

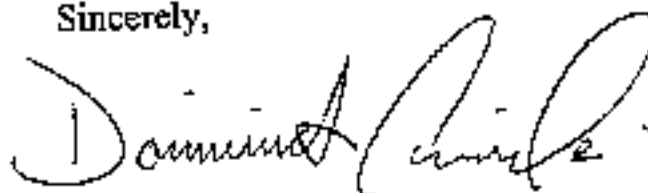
Please note that a written request may not include an additional solicitation or material on any other subject, other than thanking the contributor for the donation, and must include a pre-addressed return post card or envelope for the contributor's response. An oral request must be documented in writing. 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) originally disclosing the contribution(s). (11 CFR §104.3(a)(4)(i) and 11 CFR § 104.7)

-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.

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. My local number is (202) 694-1130.

Sincerely,



Dominick Ciaraldi
Reports Analyst
Reports Analysis Division

PAYROLL DEDUCTIONS

SCHEDULE A		ITEMIZED RECEIPTS		USE THESE SPACES FOR EACH COLUMN OF THE Detailed Summary Page	PAGE	OF
Contributions from Individuals				FOR LINE NUMBER 11(b)(1)		
Any information shown on this Report and Statement may not be used by any person for the purpose of reporting contributions or for campaign purposes, other than using the name and address of any political committee to solicit contributions from such persons.						
NAME OF COMMITTEE IN FULL		National Organization PAC 00000001				
A. Full name, mailing address and ZIP Code		Name of Employer		Date received (M, Y, 1992)	Amount of Each Receipt and Total	
Anne Sullivan 21 18th Street City, State ZIP		National Organization, Inc.		payroll deduction	\$72.00	
Occupation		Branch Manager		(\$12 biweekly)		Aggregate total to date > \$ 228.00
B. Full name, mailing address and ZIP Code		Name of Employer		Date received (M, Y, 1992)	Amount of Each Receipt and Total	
Rodney Jones 881 Hamlet Road City, State ZIP		National Organization, Inc.		payroll deduction	\$120.00	
Occupation		Vice President		(\$20 biweekly)		Aggregate total to date > \$ 380.00

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

IN-KIND CONTRIBUTIONS

SCHEDULE A		ITEMIZED RECEIPTS		USE THESE SPACES FOR EACH COLUMN OF THE Detailed Summary Page	PAGE	OF
Contributions from Individuals				FOR LINE NUMBER 11(b)(1)		
Any information shown on this Report and Statement may not be used by any person for the purpose of reporting contributions or for campaign purposes, other than using the name and address of any political committee to solicit contributions from such persons.						
NAME OF COMMITTEE IN FULL		National Organization PAC 00000001				
A. Full name, mailing address and ZIP Code		Name of Employer		Date received (M, Y, 1992)	Amount of Each Receipt and Total	
Martin L. Kruee 4 River Road City, State ZIP		National Organization, Inc.		8/19/92	\$3,999.00 (IN-KIND)	
Occupation		CHAIRMAN		(\$1,000 RAFFLE PRIZE)		Aggregate total to date > \$ 3,999.00

SCHEDULE B		ITEMIZED DEDUCTIONS		USE THESE SPACES FOR EACH COLUMN OF THE Detailed Summary Page	PAGE	OF
Operating Expenditures/Other Federal				FOR LINE NUMBER 21(b)		
Any information shown on this Report and Statement may not be used by any person for the purpose of reporting contributions or for campaign purposes, other than using the name and address of any political committee to solicit contributions from such persons.						
NAME OF COMMITTEE IN FULL		National Organization PAC 00000001				
A. Full name, mailing address and ZIP Code		Purpose of Deduction		Date received (M, Y, 1992)	Amount of Each Deduction and Total	
Martin L. Kruee 4 River Road City, State ZIP		raffle prize		8/19/92	\$3,999.00 (IN-KIND CONTRIBUTION)	
Department or Other receipt						

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

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 \$195 — 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

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

The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that every entry, no matter how small, should be recorded to ensure the integrity of the financial statements. This includes not only sales and purchases but also expenses and income. The document provides a detailed list of items that should be tracked, such as inventory levels, accounts receivable, and accounts payable. It also outlines the procedures for reconciling these accounts and resolving any discrepancies.

The second part of the document focuses on the preparation of financial statements. It explains the different types of statements, including the balance sheet, income statement, and cash flow statement, and how they are prepared. It provides a step-by-step guide to calculating each component of these statements and offers tips for ensuring their accuracy. The document also discusses the importance of comparing the results of the current period with those of the previous period to identify trends and potential areas of concern.

The final part of the document addresses the issue of tax compliance. It provides an overview of the tax laws that apply to the business and offers advice on how to minimize the tax burden. This includes information on deductions, credits, and other tax-saving strategies. The document also discusses the importance of staying up-to-date on changes in tax law and the need to consult with a tax professional for complex issues.