



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Charles A. Neale, Treasurer  
National Bank of Commerce Committee  
on Political Affairs  
One Commerce Square  
Memphis, TN 38150

DEC - 4 1996

Identification Number: C00095786

Reference: October Quarterly Report (7/1/96-9/30/96)

Dear Mr. Neale:

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 discloses a contribution(s) towards the election campaign of a Presidential candidate(s). Please note that contributions to Presidential candidates are governed by specific regulations. Please refer to the following explanation of Presidential election financing, and then amend your report to clarify this contribution(s).

All Presidential primary elections held during an election year are considered one election for the purpose of the contribution limits. A multi-candidate committee, therefore may give only \$5,000 to a Presidential candidate's primary campaign, regardless of how many separate state Presidential primaries in which the candidate participates. 11 CFR §§110.1(j)(1) and 110.2(i)(1)

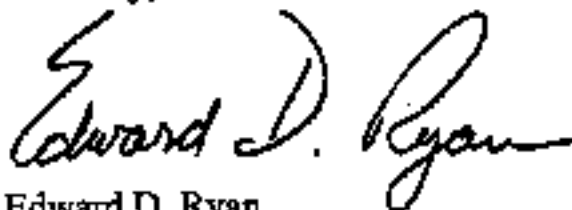
In the general election, contributions to major party (Republican and Democratic) Presidential campaigns are not permitted if the candidate receives public funds. (An exception: Political committees may contribute to a publicly funded Presidential nominee's "compliance fund." A compliance fund is used solely for legal and accounting expenses incurred in complying with the election law. Gifts to compliance funds are considered contributions and are subject to usual per-candidate, per-election limits. 11 CFR §9003.3(a)

-Please amend Schedule B supporting Line 23 by providing the election designation for each contribution made to a federal candidate or political committee. 11 CFR §§104.3(b)(3)(ii) and (v)

-For future reporting, please be advised that only contributions to federal candidates and political committees should be itemized on a separate Schedule B supporting Line 23 of the Detailed Summary Page. Contributions to non-federal candidates and committees should be itemized on Schedule B supporting Line 29.

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) 219-3580.

Sincerely,



Edward D. Ryan  
Reports Analyst  
Reports Analysis Division

**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

Use separate schedule B for each category of the Detailed Summary Page

PAGE 1 OF 2  
FOR LINE NUMBER 23

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 (or Fund)

**NATIONAL BANK OF COMMERCE COMMITTEE ON POLITICAL AFFAIRS (COPA)**

| A. Full Name, Mailing Address and ZIP Code                                   | Purpose of Disbursement  | Date (month, day, year) | Amount of Each Disbursement This Period |
|--|--|-------------------------|---|
| Tennessee for Thompson<br>1808 West End Avenue<br>Nashville, TN 37203        | U. S. Senate<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify)        | 7/12/96                 | 1,000.00                                |
| B. Full Name, Mailing Address and ZIP Code                                   | Purpose of Disbursement  | Date (month, day, year) | Amount of Each Disbursement This Period |
| Ed Bryant for Congress Committee<br>P. O. Box 1961<br>Cordova, TN 38068-1961 | U. S. House of Rep.<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify) | 7/12/96<br>9/30/96      | 1,000.00<br>1,500.00                    |
| C. Full Name, Mailing Address and ZIP Code                                   | Purpose of Disbursement  | Date (month, day, year) | Amount of Each Disbursement This Period |
| Tennessee Unity '96<br>3022 Vanderbilt Place<br>Nashville, TN 37212          | Dole for President<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify)  | 7/12/96<br>7/26/96      | 500.00<br>2,500.00                      |
| D. Full Name, Mailing Address and ZIP Code                                   | Purpose of Disbursement  | Date (month, day, year) | Amount of Each Disbursement This Period |
| Rod Deberry for Congress<br>P. O. Box 770545<br>Memphis, TN 38177-0545       | U.S. House of Rep.<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify)  | 8/15/96                 | 500.00                                  |
| E. Full Name, Mailing Address and ZIP Code                                   | Purpose of Disbursement  | Date (month, day, year) | Amount of Each Disbursement This Period |
| Clinton-Gore '96<br>P. O. Box 19100<br>Washington, DC 20036-9100             | U. S. Presidential<br>Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify)  | 9/30/96                 | 3,000.00                                |
| F. Full Name, Mailing Address and ZIP Code                                   | Purpose of Disbursement  | Date (month, day, year) | Amount of Each Disbursement This Period |
|  | Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify)                        |                         |   |
| G. Full Name, Mailing Address and ZIP Code                                   | Purpose of Disbursement  | Date (month, day, year) | Amount of Each Disbursement This Period |
|  | Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify)                        |                         |   |
| H. Full Name, Mailing Address and ZIP Code                                   | Purpose of Disbursement  | Date (month, day, year) | Amount of Each Disbursement This Period |
|  | Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify)                        |                         |   |
| I. Full Name, Mailing Address and ZIP Code                                   | Purpose of Disbursement  | Date (month, day, year) | Amount of Each Disbursement This Period |
|  | Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General<br><input type="checkbox"/> Other (specify)                        |                         |   |

SUBTOTAL of Disbursements This Page (optional)

11,000.00

TOTAL This Period (fill page 6 to line number only)

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中國銀行