



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

November 12, 2019

STEVEN EARLEY, TREASURER
ZIONS BANCORPORATION POLITICAL ACTION
COMMITTEE
7730 UNION PARK AVE STE 350
MIDVALE, UT 84047

Response Due Date
12/17/2019

IDENTIFICATION NUMBER: C00275230

REFERENCE: AMENDED MID-YEAR REPORT (01/01/2019 - 06/30/2019), RECEIVED
09/26/2019

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 3 item(s):

1. The beginning cash balance of this report does not equal the ending balance of your Year-End Report (11/27/18 - 12/31/18). Please correct this discrepancy and amend all subsequent report(s) that may be affected by the correction. (52 U.S.C. §30104(b))
2. Schedule B supporting Line 21(b) of your Detailed Summary Page discloses a disbursement for "adjust book balance of cash to bankvoided checks unable to trace orig date" for \$7,097.66. In memo text you state, "adjust book balance of cash to bankvoided checks unable to trace orig date". Please provide any clarifying information as to the details of this disbursement and why this activity was not disclosed on the original report covering the period during which it took place.
3. Your calculations for Line 8 appear to be incorrect. Cash on hand at the close of the current reporting period should always equal the closing calendar year to date cash on hand amount. Please provide the corrected total on the Summary Page. (52 U.S.C. §30104(b))

- Your report discloses certain categories of financial activity that have been reflected on the wrong lines of the Detailed Summary Page. For your

ZIONS BANCORPORATION POLITICAL ACTION COMMITTEE

Page 2 of 2

information and consideration when preparing future filings, disbursements to non-federal candidates and committees should be properly disclosed on a separate Schedule B, supporting Line 29 of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing. (52 U.S.C. §30104(b) and FORM 3X Instructions)

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. For additional information about the report review process or specific filing information for your committee type, please visit <http://transition.fec.gov/rad/>. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1176.

Sincerely,



Michael Adamsky
Senior Campaign Finance Analyst
Reports Analysis Division