



Compass Bancshares

RECEIVED  
FEDERAL CENTER

Compass Bancshares, Inc.  
P.O. Box 10566  
Birmingham, Alabama 35296

2009 JAN 26 AM 10: 28

December 29, 2008

Christopher J. Morse  
999 E Street NW  
Federal Election Commission  
Washington, D.C. 20463

Identification Number: C00142596

Reference: October Quarterly Report (7/01/08-9/30/08)

Dear Sir:

In reference to your letter dated November 26, 2008, the contributions to candidates for the **primary** election were incorrectly disclosed. They should have been designated as **general** election, and will be reflected on the December Quarterly Report.

Copies of letters to these recipients requesting this re-designation are enclosed, along with a copy of your letter. Please let me know if you need more information,

Sincerely,

Sue L. Brewis, Treasurer  
Compass Bancshares Inc., PAC

Enclosures

29039991160



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RQ-2

FEDERAL ELECTION COMMISSION 28  
WASHINGTON, D.C. 20463

November 26, 2008

Sue L. Brewis, Treasurer  
Compass Bancshares Inc., PAC  
P.O. Box 10566  
Birmingham, AL 35296

**Response Due Date:**  
**December 29, 2008**

Identification Number: C00142596

Reference: October Quarterly Report (7/01/08-9/30/08)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) 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 item:

- Schedule B supporting Line 23 of your report discloses one or more contributions to a candidate(s) for the primary election; however, the funds were disbursed after the election date(s) (see attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign.

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If the contribution(s) in question should have been designated for debt retirement, you should amend your report to indicate "debt retirement," along with the year of election.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund.

29039991161

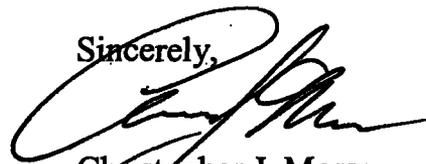
Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which 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 this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

**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. 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) 694-1133.

Sincerely,



Christopher J. Morse  
Senior Campaign Finance Analyst  
Reports Analysis Division

Contributions Made After Election Date

Recipient Name	Date	Amount	Election	Election State - Date
Aderholt for Congress	8/06/08	\$5,000	Primary	AL - 6/03/08
Shock for Congress	8/06/08	\$500	Primary	IL - 2/05/08
Hayes for Congress	8/06/08	\$500	Primary	NC - 5/06/08
Lance for Congress	8/06/08	\$500	Primary	NJ - 6/03/08
Darren White for Congress	8/06/08	\$2,500	Primary	NM - 6/03/08
Steve Chabot for Congress	8/06/08	\$500	Primary	OH - 3/04/08

*Gen'l*  
*Gen'l*

29039991163

From: FEC Filing Server <http\_db@sdrdc.com>  
To: <dana.flaherty@compassbank.com>  
Date: 1/2/2009 3:31 PM  
Subject: FEC Electronic Filing Results

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FEC FILING CENTER  
2009 JAN 26 AM 10:28

**DISCLOSE -- FEC Financial Disclosure Filing Acknowledgement**

This is to acknowledge the receipt and acceptance of your electronic filing via the DISCLOSE protocol.

Your filing was received and accepted by our system at 01/02/2009 - 16:29:51, and was assigned the Filing ID of: FEC-393371

Please make a note of this, as it will be necessary to refer to this information in the future.

Thank you for using DISCLOSE.

Do not reply to this notice. It is sent from an unattended account that cannot receive email.

For your reference, the output of the validation check was as follows:

FEC File Validator      Version 6.2.1.2  
  
Developed for the Federal Election Commission  
by NIC Technologies, 1996-2008  
Portions Copyright (C) Micro Focus, 1984-1997

=== Identification Section =====

Committee ID: C00142596  
Committee Name: COMPASS BANCSHARES, INC PAC  
Filing Type: F99

Software/Ver#: <microPAC>~ Political Action Committee InfoSystem by Donelson

=== Results Section =====

>>>----> FEC data file PASSED validation! <----<<<<  
MD5 checksum:  
60a226bc83b22b3f9dfc22d936563a4b

29039991164

**DISCLOSE -- FEC Financial Disclosure Filing Acknowledgement**

This is to acknowledge the receipt and acceptance of your electronic filing via the DISCLOSE protocol.

Your filing was received and accepted by our system at 01/02/2009 - 16:29:51, and was assigned the Filing ID of: FEC-393371

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Developed for the Federal Election Commission  
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Committee ID: C00142596  
Committee Name: COMPASS BANCSHARES, INC PAC  
Filing Type: F99  
Software/Ver#: <microPAC>~ Political Action Committee InfoSystem by Donelson

=== Results Section =====

>>>----> FEC data file PASSED validation! <----<<<  
MD5 checksum:  
60a226bc83b22b3f9dfc22d936563a4b

29039901165

**TEXT ATTACHMENT**

IN RESPONSE TO A LETTER FROM THE FEC DATED NOVEMBER 26, 2008 REGARDING THE COM  
PASS BANCSHARES INC. PAC, C00142596, EFFECTIVE DECEMBER 29, 2008 WE ARE SENDIN  
3 LETTERS TO THE FOLLOWING CANDIDATE COMMITTEES AUTHORIZING THEM TO REDESIGNAT  
E OUR CONTRIBUTIONS FROM PRIMARY 2008 TO GENERAL 2008. COPIES OF THESE LETTER  
S WILL BE FORWARDED TO THE FEC.

ADDERHOLT FOR CONGRESS; 08/06/08; 5,000.00

SHOCK FOR CONGRESS; 08/06/08; 500.00

HAYES FOR CONGRESS; 08/06/08; 500.00

LANCE FOR CONGRESS; 08/06/08; 500.00

DARREN WHITE FOR CONGRESS; 08/06/08; 2,500.00

STEVE CHABOT FOR CONGRESS; 08/06/08; 500.00

THESE REDESIGNATIONS WILL APPEAR IN OUR 2008 YEAR-END FEC 3X REPORT.

29039991166

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**Compass Bancshares**

RECEIVED  
FEDERAL CENTER

Compass Bancshares, Inc.  
P.O. Box 10566  
Birmingham, Alabama 35296

2009 JAN 26 AM 10: 28

December 29, 2008

Aderholt for Congress  
P.O. Box 1158  
Haleyville, AL 35565

Dear Sirs,

On August 6, 2008 Compass Bancshares Inc., PAC made a contribution for \$5000 to Aderholt for Congress designated as **primary election 2008**. Please accept this letter to re-designate that contribution as **general election 2008**. We have made the corresponding re-designation in our FEC reporting.

Please do not hesitate to contact me if you have any questions concerning this request.

Sincerely,



Sue L. Brewis, Treasurer  
Compass Bancshares Inc., PAC

29039991167

**Compass Bancshares**

RECEIVED  
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2008 JAN 26 AM 10:28

Compass Bancshares, Inc.  
P.O. Box 10566  
Birmingham, Alabama 35296

December 29, 2008

Shock for Congress  
P.O. Box 10555  
Peoria, IL 61612

Dear Sirs,

On August 6, 2008 Compass Bancshares Inc., PAC made a contribution for \$500 to Shock for Congress designated as **primary** election 2008. Please accept this letter to re-designate that contribution as **general** election 2008. We have made the corresponding re-designation in our FEC reporting.

Please do not hesitate to contact me if you have any questions concerning this request.

Sincerely,



Sue L. Brewis, Treasurer  
Compass Bancshares Inc., PAC

29039991168



# Compass Bancshares

Compass Bancshares, Inc.  
P.O. Box 10566  
Birmingham, Alabama 35296

December 29, 2008

Hayes for Congress  
P.O. Box 2000  
Concord, NC 28026

Dear Sirs,

On August 6, 2008 Compass Bancshares Inc., PAC made a contribution for \$500 to Hayes for Congress designated as **primary** election 2008. Please accept this letter to re-designate that contribution as **general** election 2008. We have made the corresponding re-designation in our FEC reporting. I have also received your letter requesting this change.

Please do not hesitate to contact me if you have any questions concerning this request.

Sincerely,



Sue L. Brewis, Treasurer  
Compass Bancshares Inc., PAC

29039991169



December 15, 2008

Mr. Jerry W. Powell  
General Counsel  
BancPac  
15 South 20<sup>th</sup> Street  
Suite 1802  
Birmingham, AL 35233

Dear Mr. Powell:

Thank you for your generous contribution to Hayes for Congress. We appreciate your generous support throughout our tough re-election campaign.

Your contribution of \$500 (check number 6480) was received on August 12<sup>th</sup> and you indicated that it was for the Primary Election. Our primary took place on May 6<sup>th</sup> and the contribution was designated towards the General Election.

Again, thank you for your support. Please don't hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Behr". The signature is fluid and cursive, with a long, sweeping underline.

Jennifer Behr  
Finance Director

29039991170



# Compass Bancshares

Compass Bancshares, Inc.  
P.O. Box 10566  
Birmingham, Alabama 35296

December 29, 2008

Lance for Congress  
P.O. Box 225  
Colonia, NJ 07067

Dear Sirs,

On August 6, 2008 Compass Bancshares Inc., PAC made a contribution for \$500 to Lance for Congress designated as **primary** election 2008. Please accept this letter to re-designate that contribution as **general** election 2008. We have made the corresponding re-designation in our FEC reporting. I have also received your letter requesting this change.

Please do not hesitate to contact me if you have any questions concerning this request.

Sincerely,

Sue L. Brewis, Treasurer  
Compass Bancshares Inc., PAC

29039991171

# Lance for Congress

PO Box 225 Colonia, NJ 07067

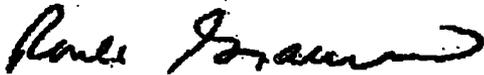
Dear Melanie:

This letter is to inform you that the Lance for Congress Congressional Committee gratefully received the contribution of your PAC, Compass Bancshares, Inc. PAC, in the amount of \$500.00 dated 9/9/08 and reported it in its Oct 15<sup>th</sup> 2008 quarterly report as a General contribution, since at that time we did not have Primary 2008 debt.

I think the appropriate treatment is for your committee to amend the report to show the contribution as General 2008 Cycle since we had to designate it to the General 2008 on our records.

Please let me know if you need anything further or if I can help in any way. I can be reached at email: [comm.rongravino@att.net](mailto:comm.rongravino@att.net) or telephone (732) 248-4178.

Best regards,



Ron Gravino  
Treasurer

29039991172



**Compass Bancshares**

Compass Bancshares, Inc.  
P.O. Box 10566  
Birmingham, Alabama 35296

December 29, 2008

Darren White for Congress  
P.O. Box 16601  
Albuquerque, NM 87191

Dear Sirs,

On August 6, 2008 Compass Bancshares Inc., PAC made a contribution for \$2500 to Darren White for Congress designated as **primary** election 2008. Please accept this letter to re-designate that contribution as **general** election 2008. We have made the corresponding re-designation in our FEC reporting.

Please do not hesitate to contact me if you have any questions concerning this request.

Sincerely,

A handwritten signature in cursive script that reads "Sue Brewis".

Sue L. Brewis, Treasurer  
Compass Bancshares Inc., PAC

29039991173



**Compass Bancshares**

Compass Bancshares, Inc.  
P.O. Box 10566  
Birmingham, Alabama 35296

December 29, 2008

Steve Chabot for Congress  
3339 Harrison Ave.  
Cincinnati, OH 45211

Dear Sirs,

On August 6, 2008 Compass Bancshares Inc., PAC made a contribution for \$500 to Steve Chabot for Congress designated as **primary** election 2008. Please accept this letter to re-designate that contribution as **general** election 2008. We have made the corresponding re-designation in our FEC reporting.

Please do not hesitate to contact me if you have any questions concerning this request.

Sincerely,

A handwritten signature in cursive script that reads "Sue Brewis".

Sue L. Brewis, Treasurer  
Compass Bancshares Inc., PAC

29039991174

Federal Election Commission  
**ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS**  
 The FEC added this page to the end of this filing to indicate how it was received.

Date of Receipt

Hand Delivered

Postmarked

USPS First Class Mail

*1/5/09*

Postmarked (R/C)

USPS Registered/Certified

Postmarked

USPS Priority Mail

Delivery Confirmation™ or Signature Confirmation™ Label

Postmarked

USPS Express Mail

Postmark Illegible

No Postmark

Shipping Date

Overnight Delivery Service (Specify):

Next Business Day Delivery

Date of Receipt

Received from House Records & Registration Office

Date of Receipt

Received from Senate Public Records Office

Date of Receipt

Received from Electronic Filing Office

Date of Receipt or Postmarked

Other (Specify):

*Jm*

PREPARER

*1/26/09*

DATE PREPARED

(3/2005)

29039991175