



HUNTINGTON COLLEAGUES' GOOD GOVERNMENT FUND

Be Informed. Be Involved. Make a Difference.

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Mary Navarro, Retail & Business
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Keith Sanders, Human Resources

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Frank Hierro, Mahoning Valley

Mike Newbold, Indiana

Mark Reitzes, Cincinnati/Dayton

Clayton Rice, West Virginia

William Shivers, Akron/Canton

Sharon Speyer, Northwest Ohio

Dan Walsh, Cleveland

Business Segment Leaders
Jim Baroni, Retail

John Bilardo, Treasury
Management, *Secretary*

Steve George, IT

Jon Greenwood, Retail

John Irwin, Commercial

Nancy Kelly, PFG/Retirement Plan
Services

Patrick Kelly, Credit, *Chairman*

Vince Locher, CRE

Mary Beth Sullivan, Insurance

Denny Thompson, Corporate
Insurance, *Treasurer*

Todd Williams, Specialty Banking

Ex-Officio

John Liebersbach, Legal

Todd Bailey, HBI-PAC Manager

Barbara Benham, Government
Relations

Jan. 15, 2011

Mr. Michael Cantwell
Steve Chabot for Congress
3030 Harrison Avenue
Cincinnati, OH 45211

Dear Mr. Cantwell:

It has come to our attention that in making a debt retirement contribution of \$2,500 on 12/13/2010, HBI-PAC exceeded the legal limit for the Steve Chabot for Congress committee's 2010 general election period by \$1,500.

As such, we kindly request a refund of the \$1,500 portion of the 12/13/2010. The check can be made payable to HBI-PAC, 41 S. High St., HC1244, Columbus, OH 43215.

Thank you for your assistance, and we apologize for any trouble this may have caused. If you have questions or need additional information, do not hesitate to contact me at 614-480-4757.

Sincerely,

Todd Bailey
HBI-PAC Manager

RECEIVED
2011 APR 26 AM 10:45
FEC MAIL CENTER

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April 15, 2011

Mr. David Neinhuis
Bill Huizenga for Congress
441 William Court
Zeeland, MI 49464

Dear Mr. Neinhuis:

It has come to my attention that Huntington BancShares Inc. Political Action Committee (HBI-PAC) ("the PAC") has designated the December 13, 2010 contribution to Huizenga for Congress committee's 2010 General Debt Retirement election, when it appears the committee had insufficient debts to permit the contribution.

As the contribution was made on December 13, 2010, it does not fall within the 60-day period that would legally allow the PAC to redesignate the contribution to the 2012 Primary election. As such, I kindly request that Huizenga for Congress refund the \$1,500 contribution.

Thank you for your assistance. I apologize for any trouble this may have caused. If you have questions or need additional information, please call 614-480-4757.

Sincerely,
Denny Thompson
HBI-PAC Treasurer
FEC ID C00165589

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Barbara Benham, Government
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April 21, 2011

Maureen Benitz
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: Huntington Bancshares Inc. Political Action Committee (HBI-PAC)
FEC ID C00165589
Year-End Report (11/23/2010 – 12/31/2010)

Dear Ms. Benitz:

To comply with the requirements set out under 11 CFR § 110.2 (b) the Huntington Bancshares Inc. Political Action Committee (the PAC) has requested refunds of the excess contributions from each of the campaigns. Attached for your reference are copies of the refund requests sent to the Treasurers of the Steve Chabot for Congress committee and of the Huizenga for Congress committee.

The PAC regrets the administrative error that resulted in these excess contributions.

Should you have any questions, I can be reached at (614) 480-4723.

Sincerely,

Denise Thompson
Treasurer, HBI-PAC

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2011 APR 26 AM 10:45
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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

April 12, 2011

DENISE THOMPSON, TREASURER
HUNTINGTON BANCSHARES INC. POLITICAL
ACTION COMMITTEE (HBI-PAC)
41 S. HIGH ST
COLUMBUS, OH 43287

Response Due Date
05/17/2011

IDENTIFICATION NUMBER: C00165589

REFERENCE: YEAR-END REPORT (11/23/2010 - 12/31/2010)

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 2 item(s):

1. Schedule B of your report discloses one or more contributions to "Huizenga for Congress" for the retirement of debts incurred by the 2010 General election campaign; however, it appears that the recipient committee(s) had insufficient debts to warrant such a contribution. Please note that a committee may only designate contributions to retire a candidate's debts if those debts exist.

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

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.

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, refunds are reported on Line 16 of the Detailed Summary Page and on Schedule A of the report covering the period during which they are received. Redesignations are reported as memo entries

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HUNTINGTON BANCSHARES INC. POLITICAL ACTION COMMITTEE (HBI-PAC)

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on Schedule B of the report covering the period during which the redesignation is made. 11 CFR §110.2(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.

2. Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If any contribution you made exceeds the limits, you must request a refund of the excessive amount 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 of the excessive amount.

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 the excessive contribution(s), 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

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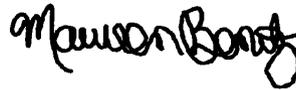
HUNTINGTON BANCSHARES INC. POLITICAL ACTION COMMITTEE (HBI-PAC)

Page 3 of 3

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) 694-1147.

Sincerely,



Maureen Benitz
Senior Campaign Finance and Reviewing Analyst
Reports Analysis Division

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Excessive Contribution To a Committee/Candidate:

Recipient Name	Date	Amount	Election	Report
Steve Chabot for Congress	7/13/10	\$1,000	G-2010	2010 August Monthly
Steve Chabot for Congress	9/29/10	\$3,000	G-2010	2010 October Monthly
Steve Chabot for Congress	12/13/10	\$2,500	G-2010	2010 Year-End

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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.

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<input type="checkbox"/> Hand Delivered	Date of Receipt
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<input type="checkbox"/> USPS First Class Mail	Postmarked
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<input type="checkbox"/> USPS Registered/Certified	Postmarked (R/C)
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<input type="checkbox"/> USPS Priority Mail	Postmarked
Delivery Confirmation™ or Signature Confirmation™ Label	<input type="checkbox"/>

<input type="checkbox"/> USPS Express Mail	Postmarked
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<input type="checkbox"/> Postmark Illegible	
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<input type="checkbox"/> No Postmark	
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<input checked="" type="checkbox"/> Overnight Delivery Service (Specify): <i>FedEx</i>	Shipping Date <i>4/25/11</i>
Next Business Day Delivery	<input checked="" type="checkbox"/>

<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
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<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
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<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
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<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked
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<i>JMW</i> PREPARER	<i>4/26/11</i> DATE PREPARED
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