

ZIONS BANK

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2005 JAN -4 A 9 51

January 3, 2005

Jodi Winship
Campaign Finance Analyst
Federal Election Commission
Washington, D.C. 20463

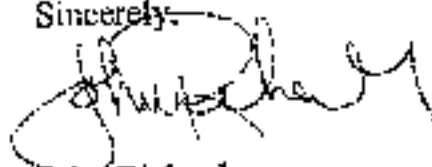
Reference: October Quarterly Report for C00275230

Dear Ms. Winship:

This letter is in response to the notification received for the report October Quarterly Report (7/1/04-9/30/04). My apologies for the error in reporting funds for an election that has already occurred. The error was an input error and the funds should have been designated to the general election for both candidates. I have made the changes to the contributions and filed an amended report for that period. In the case of Chris Cannon for Congress, those funds were returned to the PAC after the original report was filed. That change is also reflected in the amended report.

I appreciate your assistance in helping us correct the errors in our reports. Should you need additional documentation regarding these contributions or any additional information from our PAC, you can contact me at 801-326-5589 or via email at jrichards1@zionsbank.com.

Sincerely,



John Richards
Zions Bancorporation

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RQ-2

2005 JAN -4 A 9 51



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 3, 2004

John Richards, Treasurer
Zions Bancorporation Political Action Committee
255 North Admiral Byrd Rd
Salt Lake City, UT 84116

Response Due Date:
January 5, 2005

Identification Number: C00275230

Reference: October Quarterly Report (7/1/04-9/30/04)

Dear Mr. Richards:

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. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Schedule B supporting Line 23 of your report discloses one or more contributions to a candidate(s) for the 2004 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.

ZIONS BANCORPORATION POLITICAL ACTION COMMITTEE

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

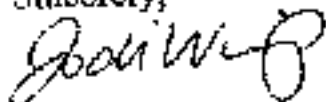
Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which 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.

Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. 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.

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) 694-1136.

Sincerely,



Jodi Winship
Campaign Finance Analyst
Reports Analysis Division

ZIONS BANCORPORATION POLITICAL ACTION COMMITTEE

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Recipient Name	Date	Amount	Election	Election State - Date
Chris Cannon for Congress Inc	08/30/2004	\$2,000.00	P2004	UT - 06/22/2004
Mike Crapo for Congress Committee	08/30/2004	\$500.00	P2004	ID - 05/25/2004

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.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input type="checkbox"/> USPS First Class Mail	Postmarked
<input type="checkbox"/> USPS Registered/Certified	Postmarked (R/C)
<input type="checkbox"/> USPS Priority Mail	Postmarked
Delivery Confirmation™ Label <input type="checkbox"/>	
<input type="checkbox"/> USPS Express Mail	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input checked="" type="checkbox"/> Overnight Delivery Service (Specify): <i>DHL</i>	Shipping Date <i>1/3/05</i>
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked
<i>JM 10</i> PREPARER (5/2004)	<i>1/4/05</i> DATE PREPARED