



Compass Bancshares

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

RECEIVED
FEC MAIL CENTER

March 24, 2009 9:20

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

Identification Number: C00142596

Reference: Year End Report (11/25/08-12/31/08)

Dear Sir:

This is in response to your letter dated March 4, 2009.

- 1) Excessive Contributions to a Candidate. The 7/31/07 payment should have been designated as 2008 Primary, and the 12/31/08 contribution was made originally on 8/06/08 and should have been designated as 2008 General. Our attempt to correct this on the yearend report made the contribution appear to have been made on 12/31/08.
- 2) Contributions Made After General Election. These also appear with a 12/31/08 date because of our attempt to correct. They were originally made on 8/06/08 and should have been designated 2008 General.

All of the impacted FEC reports have been amended and memos to support the changes filed. The following are the FEC Filing ID#s for these amended reports and memos:

2007 October Quarterly - FEC-409275
Memo explaining 2007 Oct Qtr amendment - FEC-409269
2008 YearEnd Report - FEC-409270
Memo explaining 2008 YE amendments - FEC-409272

Copies of re-designation letters to these recipients 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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

March 4, 2009

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

Response Due Date:
April 3, 2009

Identification Number: C00142596

Reference: Year End Report (11/25/08-12/31/08)

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 2 items:

1. 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

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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.

2. Schedule B supporting Line 23 of your report discloses one or more contributions to a candidate(s) for the **2008 General** 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.

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.

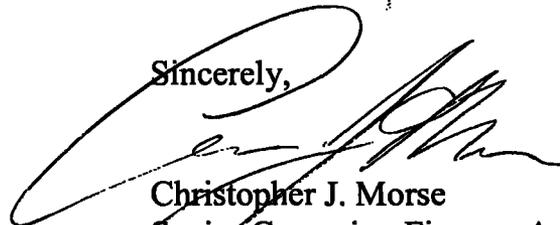
Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the

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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

Excessive Contributions to a Candidate

Recipient Name	Date	Amount	Election	Report
Aderholt for Congress	7/31/07	\$5,000	General	2007 October Quarterly
Aderholt for Congress	12/31/08	\$5,000	General	2008 Year End

Contributions Made After General Election

Recipient Name	Date	Amount	Election
Aderholt for Congress	12/31/08	\$5,000	2008 General
Schock for Congress	12/31/08	\$500	2008 General
Hayes for Congress	12/31/08	\$500	2008 General
Lance for Congress	12/31/08	\$500	2008 General
Darren White for Congress	12/31/08	\$2,500	2008 General
Steve Chabot for Congress	12/31/08	\$500	2008 General

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 **Compass Bancshares**

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

March 23, 2009

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

Dear Sirs,

In accordance with a letter from the Federal Election Commission which we received dated March 4, 2009, we authorize your committee to change the designation on a contribution which we made in the amount of \$5,000.00 dated 07/31/2007 from General 2007 to Primary 2008 to correct a typographical error on our part. We also authorize your committee to change the designation on a contribution which we made in the amount of \$5,000.00 dated 08/06/2008 from Primary 2008 to General 2008 since the contribution was made after the 2008 Primary Election in Alabama.

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

Sincerely,



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

Cc: Federal Election Commission
Reports Analysis Division
Attn: Christopher J. Morse

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 **Compass Bancshares**

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

March 23, 2009

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

Dear Sirs,

In accordance with a letter from the Federal Election Commission which we received dated March 4, 2009, we authorize your committee to change the designation on a contribution which we made in the amount of \$2,500.00 dated 08/06/2008 from Primary 2008 to General 2008 since the contribution was made after the 2008 Primary Election in New Mexico.

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

Sincerely,


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

cc: Federal Election Commission
Reports Analysis Division
Attn: Christopher J. Morse
999 E Street, NW
Washington, DC 20463

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

March 23, 2009

Hayes for Congress
Post Office Box 2000
Concord, North Carolina 28026

In accordance with a letter from the Federal Election Commission which we received dated March 4, 2009, we authorize your committee to change the designation on a contribution which we made in the amount of \$500.00 dated 08/06/2008 from Primary 2008 to General 2008 since the contribution was made after the 2008 Primary Election in North Carolina.

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

Sincerely,

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

cc: Federal Election Commission
Reports Analysis Division
Attn: Christopher J. Morse
999 E Street, NW
Washington, DC 20463

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Compass Bancshares

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

March 23, 2009

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

Dear Sirs,

In accordance with a letter from the Federal Election Commission which we received dated March 4, 2009, we authorize your committee to change the designation on a contribution which we made in the amount of \$500.00 dated 08/06/2008 from Primary 2008 to General 2008 since the contribution was made after the 2008 Primary Election in New Jersey:

Sincerely,

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

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

cc: Federal Election Commission
Reports Analysis Division
Attn: Christopher J. Morse
999 E Street, NW
Washington, DC 20463

29030062448

March 23, 2009

Schock for Congress
PO Box 10555
Peoria, Illinois 61612

In accordance with a letter from the Federal Election Commission which we received dated March 4, 2009, we authorize your committee to change the designation on a contribution which we made in the amount of \$500.00 dated 08/06/2008 from Primary 2008 to General 2008 since the contribution was made after the 2008 Primary Election in Illinois.

Sincerely,



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

cc: Federal Election Commission
Reports Analysis Division
Attn: Christopher J. Morse
999 E Street, NW
Washington, DC 20463

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Compass Bancshares

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

March 23, 2009

Steve Chabot for Congress
3030 Harrison Ave.
Cincinnati, Ohio 45211

In accordance with a letter from the Federal Election Commission which we received dated March 4, 2009, we authorize your committee to change the designation on a contribution which we made in the amount of \$2,500.00 dated 08/06/2008 from Primary 2008 to General 2008 since the contribution was made after the 2008 Primary Election in Ohio.

Sincerely,

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

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

cc: Federal Election Commission
Reports Analysis Division
Attn: Christopher J. Morse
999 E Street, NW
Washington, DC 20463

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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.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input checked="" type="checkbox"/> USPS First Class Mail	Postmarked 3/24/09
<input type="checkbox"/> USPS Registered/Certified	Postmarked (R/C)
<input type="checkbox"/> USPS Priority Mail	Postmarked
Delivery Confirmation™ or Signature Confirmation™ Label <input type="checkbox"/>	
<input type="checkbox"/> USPS Express Mail	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Overnight Delivery Service (Specify):	Shipping Date
Next Business Day Delivery <input type="checkbox"/>	
<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

0480
PREPARER
(3/2005)

4/6/09
DATE PREPARED

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