



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Sue L. Brewis, Treasurer
Compass Bancshares Inc. Political Action
Committee (COMPASS BANCPAC)
Post Office Box 10566
Birmingham, AL 35296

JAN 16 2002

Identification Number: C00142596

Reference: Mid-Year Report (1/1/01-6/30/01)

Dear Ms. Brewis:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report discloses one or more contributions to Culberson for Congress for the retirement of debts incurred by the 2000 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

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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 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.

-Schedule B supporting Line 23 of your report discloses one or more contributions to a candidate(s) for the 2000 Primary and General election; however, the funds were disbursed after the election date(s) (pertinent portion(s) 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 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.

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A response or amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments 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 need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Angel L. Williamson
Senior Reports Analyst
Reports Analysis Division

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**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)	PAGE 1290 / 1301
<input type="checkbox"/> 21b 26	<input type="checkbox"/> 22 27	<input checked="" type="checkbox"/> 23 28a
<input type="checkbox"/> 24 28b	<input type="checkbox"/> 25 28c	<input type="checkbox"/> 29

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

NAME OF COMMITTEE (in Full)
COMPASS BANCSHARES, INC PAC

A. CULBERSON FOR CONGRESS

Full Name (Last, First, Middle Initial) _____ Date of Disbursement 01 / 22 / 2001

Mailing Address 14129 MEMORIAL DRIVE

City HOUSTON State TX Zip Code 77079

Purpose of Disbursement 2000 GENERAL ELECTION DEBT RETIREMENT 24K Category/Type

Candidate Name JOHN CULBERSON

Office Sought: House Senate President Disbursement For: Primary General Other (specify) _____

State: TX District: 07

Amount of Each Disbursement this Period 2000.00

Transaction ID: B003441S000001L23

B. CULBERSON FOR CONGRESS

Full Name (Last, First, Middle Initial) _____ Date of Disbursement 01 / 25 / 2001

Mailing Address 14129 MEMORIAL DRIVE

City HOUSTON State TX Zip Code 77079

Purpose of Disbursement 2000 PRIMARY ELECTION 24K Category/Type

Candidate Name JOHN CULBERSON

Office Sought: House Senate President Disbursement For: Primary General Other (specify) _____

State: TX District: 07

Amount of Each Disbursement this Period 2500.00

Transaction ID: B003450S000001L23

C. CULBERSON FOR CONGRESS

Full Name (Last, First, Middle Initial) _____ Date of Disbursement 01 / 25 / 2001

Mailing Address 14129 MEMORIAL DRIVE

City HOUSTON State TX Zip Code 77079

Purpose of Disbursement 2000 GENERAL ELECTION 24K Category/Type

Candidate Name JOHN CULBERSON

Office Sought: House Senate President Disbursement For: Primary General Other (specify) _____

State: TX District: 07

Amount of Each Disbursement this Period 500.00

Transaction ID: B003455S000001L23

SUBTOTAL of Disbursements This Page (optional) 5000.00

TOTAL This Period (last page this line number only) 5000.00

