

RECEIVED ZIONS BANK®

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FEC MAIL CENTER

JAMES MCALLISTER
SENIOR CAMPAIGN FINANCE ANALYST
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

IDENTIFICATION NUMBER: C00275230

REFERENCE: MID-YEAR REPORT (01/01/2011-06/30/2011)

Dear Mr. McCallister,

This letter is in response to the enclosed request of information regarding the excess contributions to the Hatch Election Committee from 2007-2011. The Zions Bancorporation PAC has reviewed the contributions and worked with the Hatch Election Committee to make corrections on the election designations.

You will find included in this letter both a summary and detail report showing the total contributions made to Senator Hatch and the redesignation of funds to the Convention, Primary and General elections. The Hatch Election Committee has reported these changes to the FEC and Zions Bancorporation will also submit a redesignation of funds in the next filing period.

Please accept our apologies for the inaccuracies. We will make the necessary changes in the designation of election cycles going forward to avoid this issue in the future.

Please contact me directly with any questions or concerns. Thank you for you time and consideration.

Regards,



John Richards
Zions Bancorporation PAC, Treasurer

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

September 19, 2011

JOHN RICHARDS, TREASURER
ZIONS BANCORPORATION POLITICAL ACTION
COMMITTEE
310 SOUTH MAIN, SUITE 1420
SALT LAKE CITY, UT 84101

Response Due Date
10/24/2011

IDENTIFICATION NUMBER: C00275230

REFERENCE: MID-YEAR REPORT (01/01/2011 - 06/30/2011)

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 1 item(s):

- 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. (11 CFR §103.3(b)(1) and (3))

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

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ZIONS BANCORPORATION POLITICAL ACTION COMMITTEE

Page 2 of 2

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 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) 694-1140.

Sincerely,



James McAllister
Senior Campaign Finance Analyst
Reports Analysis Division

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Excessive Contribution to a Committee/Candidate**Zions Bankcorporation Political Action Committee (C00275230)**

Recipient Name	Date	Amount	Election	Report
Hatch Election Committee	1/26/07	\$500.00	G-2012*	2007 April Quarterly
Hatch Election Committee	6/20/07	\$1,500.00	G-2012*	2007 July Quarterly
Hatch Election Committee	3/10/08	\$1,500.00	G-2012*	2008 April Quarterly
Hatch Election Committee	8/12/09	\$1,000.00	G-2012*	2009 Year End
Hatch Election Committee	7/7/10	\$1,500.00	G-2012*	2010 October Quarterly
Hatch Election Committee	9/8/10	\$1,500.00	G-2012*	2010 October Quarterly
Hatch Election Committee	3/25/11	\$5,000.00	G-2012*	2011 Mid-Year

*Schedule B of your report discloses these contributions as designated to the 2007, 2008, 2009, 2010 and 2011 general elections; however, this candidate did not participate in a general election in these years. Therefore, these contributions have been attributed to the next scheduled Federal election for this candidate, the 2012 general election (11 CFR §110.2(b)(ii)).

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CONTRIBUTION SUMMARY

User Name: CCHAN
Run Date : October 24, 2011

Voter Registration Number	Name and Address	Mail Name Salutation Home Phone Work Phone/Address	Employer Occupation Record Type	Paid YTD	Paid To Date	Election Type
C00275230	Zions Bancorporation PAC One South Main St Salt Lake City, UT ZIP: 84133-1109	Zions Bancorporation John Richards, Treasurer 801-798-7227 801-798-8683	PAC	2500.00 0.00 0.00 0.00 0.00	2500.00 1000.00 2500.00 5000.00 0.00	Convention 2012 General 2000 General 2006 General 2012 Primary 2000 Primary 2006 Primary 2012
				5000.00	17250.00	All Contributions

CONTRIBUTION SUMMARY

User Name: CCHAN

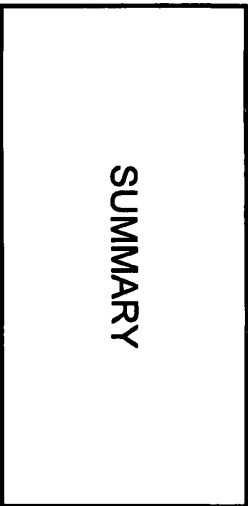
Run Date : October 24, 2011

Voter Registration Number	Name and Address	Mail Name Salutation	Home Phone	Work Phone/Address	Employer Occupation Record Type	Paid YTD	Paid To Date	Election Type
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Contribution Summary

User Name: CCHAN

Run Date : 10/24/2011



Number Of Contributors-> 1

Received YTD Total-> 5000.00

Received To Date-> 17250.00

Convention 2012	2500.00
General 2000	1000.00
General 2006	2500.00
General 2012	5000.00
Primary 2000	0.00
Primary 2006	1250.00
Primary 2012	5000.00

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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Hand Delivered Date of Receipt

USPS First Class Mail Postmarked
11/4/11

USPS Registered/Certified Postmarked (R/C)

USPS Priority Mail Postmarked
 Delivery Confirmation™ or Signature Confirmation™ Label

USPS Express Mail Postmarked

Postmark Illegible

No Postmark

Overnight Delivery Service (Specify): Shipping Date
 Next Business Day Delivery

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

Other (Specify): Date of Receipt or Postmarked

JMK 11/14/11
 PREPARER DATE PREPARED