



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

March 21, 2002

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

Identification Number: C00142596

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

Dear Ms. Brewis:

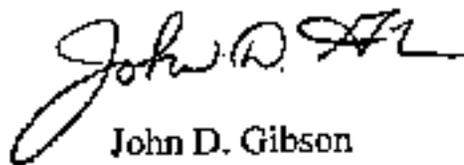
This letter is to inform you that as of March 20, 2002 the Commission has not received your response to our request for additional information, dated January 16, 2002. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

Due to recent events, the United States Postal Service is experiencing delays in the processing and delivery of mail for the Washington D.C. area. Consequently, the Federal Election Commission is not in receipt of all incoming mail. The Commission recommends that you resubmit your response to this notice and consider using alternate delivery services such as overnight delivery or delivery by courier. If feasible, your response can also be hand-delivered. You can verify the Commission's receipt of any documents submitted by your committee on the FEC website at www.FEC.gov.

An adequate response must be received at the Commission by April 10, 2002. 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 have any questions regarding this matter, please contact Angel Williamson on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division), our local number is (202) 694-1130.

Sincerely,

A handwritten signature in black ink, appearing to read "John D. Gibson". The signature is fluid and cursive, with a large initial "J" and a stylized "G".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure



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

COMPASS BANCSHARES INC. POLITICAL ACTION COMMITTEE (COMPASS
BANCPAC)

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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)

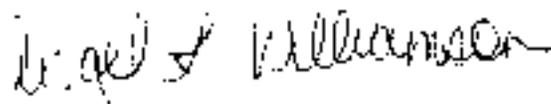
Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

COMPASS BANCSHARES INC. POLITICAL ACTION COMMITTEE (COMPASS
BANCPAC)

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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	<input type="checkbox"/> 22	<input checked="" type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 29
<input type="checkbox"/> 26	<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 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

Full Name (Last, First, Middle Initial) A. CULBERSON FOR CONGRESS		Date of Disbursement 01 / 22 / 2001	
Mailing Address 14129 MEMORIAL DRIVE		Amount of Each Disbursement this Period 2000.00	
City HOUSTON	State TX	Zip Code 77079	
Purpose of Disbursement 2000 GENERAL ELECTION DEBT RETIREMENT		24K Category/ Type	
Candidate Name JOHN CULBERSON			
Office Sought: <input checked="" type="checkbox"/> House Senate President	Disbursement For: Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) ▼		
State: TX	District: 07		
		Transaction ID: B003441S000001L23	

Full Name (Last, First, Middle Initial) B. CULBERSON FOR CONGRESS		Date of Disbursement 01 / 25 / 2001	
Mailing Address 14129 MEMORIAL DRIVE		Amount of Each Disbursement this Period 2500.00	
City HOUSTON	State TX	Zip Code 77079	
Purpose of Disbursement 2000 PRIMARY ELECTION		24K Category/ Type	
Candidate Name JOHN CULBERSON			
Office Sought: <input checked="" type="checkbox"/> House Senate President	Disbursement For: X Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		
State: TX	District: 07		
		Transaction ID: B003450S000001L23	

Full Name (Last, First, Middle Initial) C. CULBERSON FOR CONGRESS		Date of Disbursement 01 / 25 / 2001	
Mailing Address 14129 MEMORIAL DRIVE		Amount of Each Disbursement this Period 500.00	
City HOUSTON	State TX	Zip Code 77079	
Purpose of Disbursement 2000 GENERAL ELECTION		24K Category/ Type	
Candidate Name JOHN CULBERSON			
Office Sought: <input checked="" type="checkbox"/> House Senate President	Disbursement For: Primary <input type="checkbox"/> X General <input checked="" type="checkbox"/> Other (specify) ▼		
State: TX	District: 07		
		Transaction ID: B003455S000001L23	

SUBTOTAL of Disbursements This Page (optional)	5000.00
TOTAL This Period (last page this line number only)	

