



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

November 7, 2018

STEVEN EARLEY, TREASURER
ZIONS BANCORPORATION POLITICAL ACTION
COMMITTEE
7730 UNION PARK AVE, STE 350
MIDVALE, UT 84047

Response Due Date
12/12/2018

IDENTIFICATION NUMBER: C00275230

REFERENCE: OCTOBER QUARTERLY REPORT (07/01/2018 - 09/30/2018)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report 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 enforcement action.** Additional information is needed for the following 5 item(s):

1. Line 21(b) of the Detailed Summary Page of your report discloses a total of -\$250 in other federal operating expenses. The sum of the entries itemized on Schedule B, however, indicates the total to be \$750. Please amend your report to clarify the discrepancy. (11 CFR § 104.3(a) and (b))
2. The totals listed on Lines 7, 21(b), 21(c), 23, 29, 31, and 32, Column B of the Summary and Detailed Summary Pages appear to be incorrect. Column B figures for the Summary and Detailed Summary Pages should equal the sum of the Column B figures on your previous report and the Column A figures on this report. Please file an amendment to your report to correct the Column B discrepancies for this report and all subsequent report(s) which may be affected by this correction. Note that Column B should reflect only the Calendar Year-to-Date totals. (52 U.S.C. §30104(b) (formerly 2 U.S.C. § 434(b)))
3. The beginning cash balance of this report does not equal the ending balance of your July Quarterly Report (4/1/18 - 6/30/18). Please correct this discrepancy and amend all subsequent report(s) that may be affected by the correction. (52 U.S.C. §30104(b) (formerly 2 U.S.C. § 434(b)(1)))
4. Commission Regulations require the continuous reporting of all outstanding debts. This report omits debts itemized on your previous report. Please file an

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amendment to your report to disclose the current status of these omitted debts: \$300 owed to "Wright For Utah". (11 CFR §§ 104.3(d) and 104.11)

5. On Schedule D of your previous report, you disclosed debts owed to your committee from "Utah House Republican Election Committee," "Christopher Reid," and "Idaho Republican Party". These obligations, however, have been omitted from this report. Please amend your report to include these debts on Schedule D supporting Line 9 of the Summary Page. All debts and obligations must be disclosed until extinguished. (11 CFR §104.11)

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. For additional information about the report review process or specific filing information for your committee type, please visit the Reports Analysis Division's Frequently Asked Questions on the FEC website. 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) 694-1176.

Sincerely,



Michael Adamsky
Campaign Finance Analyst
Reports Analysis Division