

**REGULATION F
LIMITATIONS ON INTERBANK LIABILITIES**

In accordance with the requirements of Regulation F, below you will find the latest quarterly financial information on Zions First National Bank. This information is not a substitute for your independent analysis but is intended to assist you in the analytical process through which you justify your credit exposure with Zions Bank. Copies of the respective Call Reports are also available upon request.

Not only does Zions Bank exceed the requirements under Regulation F, under Prompt Corrective Action standards we are considered "well capitalized".

Take a look at how well Zions Bank compares to these classifications:

	<u>REGULATORY MINIMUM REQUIREMENT</u>	<u>F.D.I.C. WELL CAPITALIZED REQUIREMENT</u>	<u>ZIONS FIRST NATIONAL BANK AS OF 9/30/2009</u>
TIER 1 CAPITAL/ RISK ASSETS	4.00%	6.00%	9.81%
TOTAL CAPITAL/ RISK ASSETS	8.00%	10.00%	11.04%
LEVERAGE RATIO	4.00%	5.00%	8.77%

If you have any questions concerning this regulation or need additional information, please call Cherie McBroom (801) 844-7860.