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2005 MAR -2 A 9 47

Charles A. Neale  
Senior Vice President and Counsel

March 1, 2005

Mr. John D. Gibson  
Reports Analysis Division  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC, 20463

VIA  
FEDEX

Re: NATIONAL BANK OF COMMERCE COMMITTEE ON POLITICAL  
AFFAIRS  
IDENTIFICATION NO. C00095786

Dear Mr. Gibson,

This letter is to acknowledge receipt of your "mailgram" dated February 18, 2005, a copy of which is attached hereto, advising that the above referenced committee failed to file its year-end report with the FEC.

Our committee filed a post election report for the period 10/01/05 through 11/31/05 as well as a termination filing. We made a correction to that filing but have not made any subsequent filings for any period after 11/31/05.

Also attached hereto is correspondence dated January 12, 2005, from Ms. Maureen Benitz, FEC, advising that our termination filing had been accepted and that our committee is no longer required to make periodic filings.

It is always our intent to be in compliance with our FEC filing requirements. If I misunderstood Ms. Benitz's letter, please advise and we will undertake whatever steps necessary.

Sincerely,

Charles A. Neale  
Former secretary, NBC COPA

FEDERAL ELECTION COMMISSION  
999 E STREET, NW  
WASHINGTON, DC 20463

**WESTERN UNION MAILGRAM**



115503000415 02/18/05  
EM16105

MFS1 - MP5A

CHARLES A NEALE  
NATIONAL BANK OF COMMERCE COMMITTEE ON P  
850 RIDGE LAKE BLVD STE 101  
MEMPHIS TN 38120-9451

February 18, 2005

IDENTIFICATION NUMBER: C00095786  
REFERENCE: YEAR-END REPORT (12/01/2004 - 12/31/2004)

DEAR TREASURER:

IT HAS COME TO THE ATTENTION OF THE FEDERAL ELECTION COMMISSION (FEC) THAT YOU MAY HAVE FAILED TO FILE THE ABOVE REFERENCED REPORT OF RECEIPTS AND EXPENDITURES AS REQUIRED BY THE FEDERAL ELECTION CAMPAIGN ACT, AS AMENDED. YOU WERE PREVIOUSLY NOTIFIED OF THE DUE DATE FOR THIS REPORT.

IT IS IMPORTANT THAT YOU FILE THIS REPORT IMMEDIATELY WITH THE FEC, 999 E STREET, N.W., WASHINGTON, D.C., 20463. A COPY OF THE REPORT OR RELEVANT PORTIONS MUST ALSO BE FILED WITH THE SECRETARY OF STATE OR EQUIVALENT STATE OFFICER, UNLESS THE STATE IS EXEMPT FROM THE FEDERAL REQUIREMENT TO RECEIVE AND MAINTAIN PAPER COPIES.

DOE TO RECENT EVENTS, THE US POSTAL SERVICE IS EXPERIENCING DELAYS IN THE DELIVERY OF MAIL FOR THE WASHINGTON, DC AREA. CONSEQUENTLY, THE FEC IS NOT IN RECEIPT OF ALL INCOMING MAIL. THE COMMISSION RECOMMENDS THAT YOU SUBMIT YOUR REPORT AND CONSIDER USING ALTERNATE DELIVERY SERVICES SUCH AS OVERNIGHT DELIVERY OR DELIVERY BY COURIER. YOU CAN VERIFY THE COMMISSION'S RECEIPT OF ANY DOCUMENTS SUBMITTED BY YOUR COMMITTEE ON THE FEC WEBSITE AT WWW.FEC.GOV.

THE FAILURE TO TIMELY FILE THIS REPORT MAY RESULT IN CIVIL MONEY PENALTIES, AN AUDIT OR LEGAL ENFORCEMENT ACTION. THE CIVIL MONEY PENALTY CALCULATION FOR LATE REPORTS DOES NOT INCLUDE A GRACE PERIOD AND BEGINS ON THE DAY FOLLOWING THE DUE DATE FOR THE REPORT.

IF YOU HAVE ANY QUESTIONS REGARDING THIS MATTER, PLEASE CONTACT Todd Garland ON OUR TOLL FREE NUMBER (800)424-9530. OUR LOCAL NUMBER IS (202)694-1130.

SINCERELY,

JOHN D. GIBSON  
ASSISTANT STAFF DIRECTOR  
REPORTS ANALYSIS DIVISION

MGMCOMP 18:03 EST



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MS-K

January 12, 2005

Charles A. Neale, Treasurer  
National Bank Of Commerce Committee  
On Political Affairs  
850 Ridgeland Blvd Suite 101  
C/O Legal  
Memphis, TN 38120

Identification Number: C00095786

Reference: Termination Report (10/1/04-11/30/04)

Dear Mr. Neale:

Your committee's filing has been accepted as a valid termination as it meets the conditions set forth in 2 U.S.C. §433(d) and Section 102.3 of the Commission's Regulations. Your committee is no longer required to file reports on a periodic basis. However, 2 U.S.C. §432(d) and Sections 102.9(c) and 104.14(b)(3) of the Commission's Regulations require that you maintain your records and copies of reports for inspection for at least three (3) years. In addition, you may be required to respond to Commission requests for information regarding your committee's federal election activity and previously filed reports.

If your committee again becomes active in federal elections, it will be required to re-register with the Commission in accordance with the Federal Election Campaign Act and applicable Regulations. Your committee will be treated as a new entity by the Commission and should register as a new committee on FEC FORM 1, pursuant to 2 U.S.C. §§432(g) and 433(a).

If you have any questions concerning your status and requirements, please contact the Reports Analysis Division on the toll-free number, (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division). My local number is (202) 694-1135.

Sincerely,

A handwritten signature in black ink, appearing to read "Maureen Benitz".

Maureen Benitz  
Senior Campaign Finance Analyst  
Reports Analysis Division

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.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input type="checkbox"/> USPS First Class Mail	Postmarked
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Delivery Confirmation™ Label <input type="checkbox"/>	
<input type="checkbox"/> USPS Express Mail	Postmarked
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input checked="" type="checkbox"/> Overnight Delivery Service (Specify): Fed Ex	Shipping Date 3/1/05
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked
<i>ER</i>	3/2/05
PREPARER	DATE PREPARED