



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MS-K

February 23, 2005

Russell D. Robinson, Treasurer
Capitol Club Political Action Committee
4200 East Skelly Drive Suite 550
Tulsa, OK 74135

Identification Number: C00407668

Reference: Termination Report (11/23/04-12/31/04)

Dear Mr. Robinson:

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:

-Your Termination Report discloses \$3,699.09 in residual funds. According to 11 CFR §102.3(a), a committee must satisfy the following conditions before it can terminate: 1) it will no longer receive any contributions or make any disbursements that would otherwise qualify it as a political committee; 2) all outstanding debts and obligations have been extinguished (see 11 CFR §§116.1(a), 116.2(a) and 116.7 for debt settlement option); and 3) a statement has been submitted regarding the disposition of the committee's residual funds. Please provide any clarifying information regarding the residual funds disclosed on your Termination Report.

Please note that your committee's filing has been accepted as a termination. Your committee is no longer required to file any future 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).

An amendment or clarification to this report should be filed with the Federal Election Commission. Electronic filers must file responses and amendments in an electronic format. 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) 694-1139.

Sincerely,



Karen E. Trainer
Campaign Finance Analyst
Reports Analysis Division

