

FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

April 2, 2014

DEBORAH S. GIBSON, TREASURER AMEGY BANK NATIONAL POLITICAL ACTION COMMITTEE 4400 POST OAK PARKWAY HOUSTON, TX 77027

Response Due Date 05/07/2014

IDENTIFICATION NUMBER: C00283069

REFERENCE: AMENDED STATEMENT OF ORGANIZATION, RECEIVED 03/19/2014

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) 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 an audit or enforcement action. Additional information is needed for the following $\underline{2}$ item(s):

1. The entire name of your connected organization, "Amegy Bank National Assoc.", must be included in the name of your political committee. While committees may use commonly recognized abbreviations on daily communications such as letterhead and committee checks, committee filings (Statement of Organization, disclosure reports and amendments) must reflect the official name of the connected organization, as well as any abbreviation, within its title. Please clarify this apparent discrepancy. (2 U.S.C. §432(e)(5))

2. Your statement of organization lists "Amegy Bank National Assoc." as your connected organization, leadership PAC sponsor, affiliated committee, and joint fundraising representative. Previous statements of Organization have only listed "Amegy Bank National Assoc." as your connected organization. Please provide clarification for these additional designations of "Amegy Bank National Assoc" or amend your Statement of Organization to delete them.

Please be advised that a Leadership PAC is defined as "a political committee that is directly or indirectly established, financed, maintained or controlled by a candidate for Federal office or an individual holding Federal Office but which is not authorized committee of the candidate or individual and which is not affiliated with an authorized committee of the candidate or individual except that leadership PAC does not include a political committee of a political party."

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11 CFR §100.5(e) (6).

Please be advised that an affiliated Committee is a political committees established, financed, maintained or controlled by the same person, group of persons or organizations. Affiliated political committees are considered one political committee for purposes of contribution limits. 11 CFR §§ 100.5(g) and 110.3(a).

Additionally, please be advised that a joint fundraising committee is established by a political committee and one or more other political committees or unregistered organizations (known as "participants") to conduct jointly sponsored fundraising activity(s). The joint fundraising representative is responsible for collecting and depositing joint fundraising contributions, paying expenses, allocating proceeds and expenses to each participant, keeping records, and reporting overall joint fundraising activity. (11CFR §§ 102.2 and 102.17)

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. 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) 694-1169.

Sincerely,

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Kevin Fortkiewicz Campaign Finance Analyst Reports Analysis Division