



May 10 1998

**Comptroller of the Currency
Administrator of National Banks**

Washington, DC 20219

Pre-MUR 3102

April 29, 1998

Ms. Lois G. Lerner
Associate General Counsel
Federal Election Commission
1325 K Street, NW
Washington, D.C. 20463

Re: Referral of a Possible Violation of 2 U.S.C. § 441b
The Laredo National Bank, Laredo, Texas

Dear Ms. Lerner:

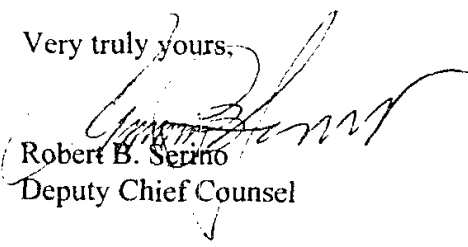
Pursuant to 2 U.S.C. § 437 the following information concerning a possible violation of the Federal Election Campaign Act of 1971 is being referred to your attention.

In the course of its supervisory and regulatory responsibilities, the OCC discovered a possible violation of 2 U.S.C. § 441b by The Laredo National Bank, Laredo, Texas ("Bank"). The OCC learned that on April 3, 1995, Gary G. Jacobs, the Bank's President, personally made a \$15,000 contribution to the Republican National Committee, and was reimbursed by the Bank for the full amount of the contribution on April 5, 1995. According to Mr. Jacobs, the reimbursement was an error, but the Bank's records indicate the reimbursement was made at Mr. Jacobs' instruction. Mr. Jacobs re-paid the Bank \$15,000 on February 24, 1998, after the apparent violation was brought to his attention by the OCC.

I trust that this letter gives ample detail to allow the Federal Election Commission to carry out its regulatory mandates. If you have any questions, please contact Gerard J. Sexton, Senior

Attorney, Enforcement Division at 202-874-5328.

Very truly yours,



Robert B. Serrino

Deputy Chief Counsel

cc: Randall M. Ryskamp, District Counsel
Southwestern District

Cora Beth Atkins, National Bank Examiner
Southwestern District