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2004 FEB 23 P 4: 13

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

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OFFICE OF GENERAL
COUNSEL

2004 FEB 23 A 11: 52

February 5, 2004

PRE-MUR # 418

Rhonda J. Vosdingh
Associate General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Subject: Referral of a Possible Violation of 2 U.S.C. § 441b
Sonoma National Bank, Santa Rosa, California

Dear Ms. Vosdingh:

Pursuant to 2 U.S.C. § 437c, 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 Sonoma National Bank, Santa Rosa, California ("Bank"). The OCC learned that the Bank issued a check on June 27, 2002 in the amount of $1,600 payable to the Sonoma County Republican Party ("SCRP"). The check was issued to purchase eight tickets for various Bank executive officers and directors to attend a dinner for the SCRP to honor its "Distinguished Citizen of the Year – 2002."

The Bank has been very cooperative during the entire investigation into this matter, and has consistently maintained that it was not aware that payment for such events might be prohibited for national banks. The Bank assisted with the OCC's discovery of the purchase of the tickets, and the individuals who attended the SCRP dinner with tickets purchased by the Bank have offered to reimburse the Bank.

We are not aware of any evidence that suggests that the Bank sought to conceal the purchase of the tickets from the OCC. We are also not aware of any other similar dinners or other political events that have been paid for by the Bank.

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 or if you would like additional information, please contact Larry Keen, Attorney, Enforcement & Compliance Division at 202-874-4800.

Sincerely,

Daniel P. Stipano
Deputy Chief Counsel

cc: Kay Kowitt, Deputy Comptroller, Western District Office
Brian Quade, Assistant Deputy Comptroller, SFFO
Lance Cantor, District Counsel, Western District Office
Jimmy Singh, Special Counsel, Western District Office

24 . 19 . 025 . 3344

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FEDERAL ELECTION COMMISSION
Washington, DC 20463

SENSITIVE

MEMORANDUM

TO: The Commission

FROM: Office of the Commission Secretary VFV

DATE: February 24, 2004

SUBJECT: Pre-MUR 418 - Complaint

The attached document is being circulated for your information.

Attachments

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