



Chase Bank of Texas, N.A.
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Maureen A. Wharton
Vice President and
Associate General Counsel

December 18, 1998

Mr. F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket
Federal Election Commission
Washington D.C. 20463

Via Airborne Express

Re: MUR 4710

Dear Mr. Turley:

My sincere thanks both to you and to Ms. Alva E. Smith for affording us an extension to December 21, 1998 to respond to your letter to us of November 18, 1998.

We have reviewed the letter to the Federal Election Committee dated January 12, 1998 from Mr. Tom Haughey, a copy of which letter was attached to your letter to us. As we understand it, Mr. Haughey's letter makes the following two allegations against Chase Bank of Texas, N.A., formerly known as Texas Commerce Bank National Association.

1. That Mr. Haughey has information that Mr. Dan Bautista was contacted by two Mexican nationals claiming they had been pressured by employees of Chase to purchase tickets to a fundraiser for Mr. Ruben Hinojosa; and
2. That Mr. Haughey believes that other individuals with offices within the "bank tower" were also offered tickets by employees of Chase.

After receiving your letter, we requested that the CEO of the Rio Grande Valley region of Chase Bank of Texas review Mr. Haughey's allegations and determine whether or not any evidence existed supporting those allegations. As you know, Mr. Haughey has not included in his letter the names of the Mexican nationals who allegedly claim to have been pressured by employees of Chase to purchase tickets, has

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not identified by name any other individuals who were allegedly offered tickets by employees, and has not provided the names of any employees who allegedly pressured or offered tickets to third parties. Nevertheless, our CEO made inquiries of multiple officers of the bank with responsibilities pertaining to both international and domestic clients to determine whether or not those individuals had any knowledge that the events asserted in Mr. Haughey's letter occurred. No evidence whatsoever was found that such events did in fact occur.

We believe that the content of Mr. Haughey's letter to the Federal Election Committee is insufficient to allege any violation by Chase Bank of Texas under applicable law. Nevertheless, we believe we have made a good faith effort to determine whether the events described in the letter occurred, and have uncovered no evidence that they did occur. We remain ready to make further investigation of these allegations if the Commission desires us to do so, and we request that the Commission provide us with specific information, including the names of the persons allegedly involved, in order to facilitate further inquiry.

Thank you very much for your courtesy and cooperation in this matter. Please do not hesitate to contact me with any further questions or requests.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Maureen Wharton", with a stylized flourish at the end.

Maureen A. Wharton

MAW:jeg

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4710

NAME OF COUNSEL: Maureen A. Wharton

FIRM: Chase Bank of Texas, N.A.

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Houston, Texas 77002

TELEPHONE: (713) 216-6652

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The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

12-18-98
Date


Signature

Associate General Counsel

RESPONDENT'S NAME: Chase Bank of Texas, N.A.

ADDRESS: 712 Main Street 26th Floor

Houston, Texas 77002

TELEPHONE: HOME () N/A

BUSINESS ()