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May 21, 2004

Mr. Brant Levine
Federal Election Commission
999 E Street NW
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

2004 MAY 24 A 11:48

RE: MUR 5366
MICHELLE ABU-HALIMEH

Dear Mr. Levine:

Ms. Abu-Halimeh affirmatively states her willingness to fully cooperate with this Commission to effectuate a speedy resolution to this matter.

Ms. Abu-Halimeh hereby submits a factual background for the Commission's consideration, and states that any violation of 2 U.S.C. 441(f) or other relevant provision was neither a knowing or willful violation, nor a deliberate attempt at circumventing the provision.

C. Tab Turner hosted a fundraiser for the benefit of the John Edwards Campaign on Saturday, Feb. 22, 2003. Mr. Turner is an attorney whose primary office is located North Little Rock, Arkansas, but whose practice is nationwide. During the week prior to this event, Mr. Turner's office staff was instructed to make all necessary preparations to ensure full attendance of the fundraiser. During this week, inclement weather in the D.C. area forestalled communications with the Edwards Campaign headquarters. Resultantly, an increased workload to ensure full attendance of the fundraiser fell to Turner's staff. This increased workload was in addition to the legal staff's normal duties in the operation of Mr. Turner's legal firm.

Ms. Abu-Halimeh, as a legal assistant to Mr. Turner, was asked to assist in both the preparations of the fundraiser, and to assist at the fundraiser itself. On Friday, February 21, 2003 it became clear that attendance would be low. Ms. Abu-Halimeh was asked to donate \$2000.00 dollars to the Edwards Campaign with the assurance that she would be reimbursed. Ms. Abu-Halimeh operated under the belief that in so doing, it would appear that the Edward's campaign had more supporters. She made the contribution, and was reimbursed the following Monday, February 24, 2003.

In April of 2003, Tom Edsall of the Washington Post contacted Ms. Abu-Halimeh, asking whether it was hard to make such a large donation. Ms. Abu-Halimeh replied that it was not hard as she had been reimbursed. Ms.

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Abu-Halimeh did not attempt to hide her actions, rather, she was forthcoming. This evidences Ms. Abu-Halimeh's innocent state of mind.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. T. Lane'.

Jonathan T. Lane

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