

FEB 20 2003

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COMMISSION
SECTION

2003 FEB 20 A 11: 24

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

MUR 5092

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4 In the Matter of)

5)
6 Michael Lazaroff)

7)
8)
9 Karon Hippard)

10 Lisa Kramer Mueller)

11 Lou Ann Wilcox)

12 Steven Wild)
13
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15 GENERAL COUNSEL'S REPORT #3
16
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18 I. ACTIONS RECOMMENDED
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20 Accept the attached Conciliation Agreement with Michael Lazaroff; take no further
21 action as to all other respondents; and close the file.

22 II. BACKGROUND
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24 On June 13, 2000, Michael Lazaroff pled guilty to federal criminal charges, some of
25 which stemmed from federal political campaign contributions he made in the names of others as
26 a result of having reimbursed various employees of his law firm for political contributions and by
27 causing the treasurers of the Gore and Bradley campaigns to make false material statements to
28 the Federal Election Commission concerning the identity of persons making contributions to the
29 campaigns. See General Counsel's Report #2, dated June 21, 2002.

30 After having received a referral from the Department of Justice and a complaint from a
31 member of the Missouri Republican Party, on July 11, 2001, the Commission found reason to
32 believe that Michael Lazaroff knowingly and willfully violated 2 U.S.C. §§ 441a(a)(1)(A) and
33 441f by making \$8,000 in federal contributions to Gore 2000, Inc. and Bill Bradley for President,
Inc. using various employees of the law firm of Thompson Coburn LLP as conduits. At the same

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1 time, the Commission also found reason to believe that the following law firm employees

2 violated 2 U.S.C. § 441f:

Karon Hippard, Lisa Kramer Mueller, Lou Ann

3 Wilcox, Steven Wild

The Commission made no findings with respect to

4 the recipient campaign committees.

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23.04.406.1162

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21 **Mr. Lazaroff has always maintained that the other Respondents in this matter were acting**
22 **at his direction, and had no financial gain or interest in his scheme. This Office has uncovered**
 no evidence indicating that this was not the case. Because of their limited involvement, this

Office recommends that the Commission take no further action and close the file as to the remaining respondents who acted as conduits, but send letters of admonishment.

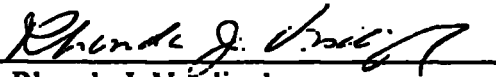
IV. RECOMMENDATIONS


1. Approve the attached conciliation agreements for Michael Lazaroff;
2. Take no further action against Karon Hippard, Lisa Kramer Mueller, Lou Ann Wilcox, Steven Wild and send letters of admonishment;
3. Approve the appropriate letters;
4. Close the file.


Lawrence H. Norton
General Counsel

2/14/03
Date

BY:


Rhonda J. Vosdingh
Associate General Counsel


Mark D. Shonkwiler
Assistant General Counsel


April J. Sands
Attorney

Attachment:

Signed Conciliation Agreement for Michael Lazaroff