

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA**

FEDERAL ELECTION COMMISSION,

Plaintiff,

v.

SAM KAZRAN a/k/a Sam Khazrawan,
and

Defendant.

CIV. NO. 3:10-cv-01155-RBD-JRK

MOTION

**JOINT MOTION FOR ENTRY OF
STIPULATED ORDER AND CONSENT JUDGMENT**

Plaintiff Federal Election Commission (“Commission”) and Defendant Sam Kazran, (together, the “Parties”) jointly move pursuant to Fed. R. Civ. P. 54 and Local Rule 3.08(b), as well as the Court’s February 23, 2012 Order in this action (Docket No. 63), for entry of a proposed Stipulated Order and Consent Judgment, attached hereto as Exhibit A.

In support of this Motion and pursuant to Local Rule 3.08(a)-(b), the Parties hereby notify the Court that they have reached an agreement to settle this case subject to, and in accordance with, the terms of the proposed Stipulated Order and Consent Judgment.

The Parties respectfully request that the Court enter the proposed Stipulated Order and Consent Judgment and terminate this case.

Respectfully submitted,

Robert A. Stok, Esq.
rstok@stoklaw.com

/s/ Joshua Kon
Joshua R. Kon, Esq.
jkon@stoklaw.com

Counsel for Defendant
Stok, Folk + Kon, P.A.
18851 NE 29th Ave.
Suite 1005
Aventura, FL 33180
(305) 935-4440

Anthony Herman
General Counsel
aherman@fec.gov

David Kolker
Associate General Counsel
dkolker@fec.gov

Kevin Deeley
Acting Associate / Assistant General Counsel
kdeeley@fec.gov

/s/ Erin Chlopak
Erin Chlopak
Attorney
echlopak@fec.gov

Counsel for Plaintiff
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463
(202) 694-1650

February 27, 2012