



FEDERAL ELECTION COMMISSION
Washington, DC 20463

January 4, 2000

William C. Oldaker, Esq.
Oldaker, Ryan, Phillips & Utrecht
818 Connecticut Avenue, N.W.
Suite 1100
Washington, D.C. 20006

RE: MUR 4646
Kennedy for Senate 2000
John F. Zamparelli, as treasurer
Kennedy for Senate 1994
John F. Zamparelli, as treasurer

Dear Mr. Oldaker:

This is to notify you that the Commission has closed its file with respect to Carol J. Lewis' complaint (MUR 4646) alleging illegal contributions to the Kennedy campaign. On April 28, 1998, the Commission found that there was reason to believe Amy Robin Habie knowingly and willfully violated 2 U.S.C. §§ 441a(a)(1)(A) and 441f and that Wallace Walker, Rhea Weil and Lawrence Herman violated 2 U.S.C. § 441f in connection with the making of the following contributions to the Kennedy campaign:

<u>Named Contributor</u>	<u>Amount</u>	<u>Reported Receipt Date</u>	<u>Recipient Committee</u>
Rhea Weil	\$1,000	5/25/95	Kennedy for Senate 1994
Lawrence Herman	\$1,000	12/11/95	Kennedy for Senate 1994
Wallace Walker	\$1,000	12/11/95	Kennedy for Senate 1994
Wallace Walker	\$1,000	3/13/96	Kennedy for Senate 2000

On February 23, 1999, the Commission further found reason to believe that Sonia Pinkus and Sue Sakolsky violated 2 U.S.C. § 441f in connection with the making of the following contributions to the Kennedy campaign:

<u>Named Contributor</u>	<u>Amount</u>	<u>Reported Receipt Date</u>	<u>Recipient Committee</u>
Sonia Pinkus	\$1,000	12 11/95	Kennedy for Senate 1994
Sue Sakolsky	\$1,000	3 13 96	Kennedy for Senate 1994
Sue Sakolsky	\$1,000	5 25 96	Kennedy for Senate 2000

The Commission found reason to believe that the above-referenced contributions actually came from Amy Robin Habie rather than the named individuals.


On December 13, 1999, a conciliation agreement signed by these respondents was accepted by the Commission, thereby concluding the matter with no Commission findings having been made against your clients. In light of the impermissible nature of these contributions, however, the Commission instructs your clients to disgorge an equivalent amount to the United States Treasury, care of the Federal Election Commission, within 30 days of your receipt of this letter and thereby avoid any need for the Commission to reopen the matter with respect to them.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

If you have any questions, please contact J. Michael Lehmann, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel