

- 22.04.405.3692
6. At all times relevant hereto, Linda Livingston was an employee in BMI's Los Angeles office.
 7. At all times relevant hereto, Doreen Ringer-Ross was an employee in BMI's Los Angeles office.
 8. At all times relevant hereto, Paige Sober was an employee in BMI's Los Angeles office.
 9. Around November, 1997, Respondent requested that certain employees make political contributions to the campaign committee of United States Representative Howard Berman. Respondent then permitted these employees to be reimbursed by the creation of false expense vouchers. Specifically:
 - A. Bolte was reimbursed with BMI's corporate funds for a \$400 contribution that she made on or about November 14, 1997;
 - B. Cane was reimbursed with BMI's corporate funds for a \$400 contribution that she made on or about on November 17, 1997;
 - C. Dickerson was reimbursed with BMI's corporate funds for a \$400 contribution that she made on or about November 14, 1997;
 - D. Livingston was reimbursed with BMI's corporate funds for a \$400 contribution that she made on or about November 14, 1997;
 - E. Ringer-Ross was reimbursed with BMI's corporate funds for an \$800 contribution that she made on or about November 14, 1997;
 - F. Sober was reimbursed with BMI's corporate funds for a \$400 contribution that she made on or about November 14, 1997.

- V. Respondent, as an individual, knowingly and willfully violated 2 U.S.C. § 441f and, as a corporate officer, knowingly and willfully violated 2 U.S.C. § 441b(a).

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- VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of Five Thousand and Six Hundred Dollars (\$5,600) pursuant to 2 U.S.C. § 437g(a)(5)(A).
- VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.
- VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.
- IX. Respondent shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.
- X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Lois G. Lerner
Acting General Counsel

BY: Abigail A. Shaine
Abigail A. Shaine
Acting Associate General Counsel

9/17/01
Date

FOR RESPONDENT:

BY: Ralph Richard "Rick" Riccobono
Ralph Richard "Rick" Riccobono

8/21/01
Date