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Federal Election Commission  
Washington, D.C. 20463

In re: MUR 4818  
Charlene Spears

Dec 15 10 22 AM '99

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COUNSEL

**RESPONSE TO ANALYSIS OF FEC  
AND REQUEST FOR CONCILIATION**

Charlene Spears acknowledges receipt of the factual and legal analysis of the FEC. Charlene Spears disagrees with some of the findings therein, and more specifically, Charlene was not an administrative assistant and/or management in the Stipe Law Firm, but during 1998 and some twenty years before that and to the present, Charlene Spears is and was the personal secretary to Gene Stipe for his law business (Spears is employed at the Stipe Law Firm), his financial and business associations and his personal business. Accordingly during this time period, Charlene Spears would have unlimited access to money of Gene Stipe to pay any and all of his personal and business obligations without any specific direction by Gene Stipe other than a general instruction to pay what is owed and do it timely.

Spears is aware of the friendship and business association of Gene Stipe with Walt Roberts. At some point prior to the campaign contributions in question, Spears pointed out to Gene Stipe that there was some extra money in his accounts. Spears got a general instruction to use the money to help elect some democratic candidates. Spears then used some money of Gene Stipe specifically for the Roberts campaign, not clearing this idea with anyone or doing the same at the specific request of anyone. Spears proposed to give some cash to Gloria Ervin, Deborah Turner, Jamie Benson, and Cynthia Montgomery (three of these individuals are fellow employees at the Stipe Law Firm). Spears used some of Gene Stipe's money for a contribution in name of Charlene Spears. Spears knew at the time that this procedure she was doing was not proper, but Spears did not know that it violated a specific statute. Charlene Spears is truly sorry for doing this and wishes to pursue pre-probable cause conciliation as per your letter of October 13, 1999.

If any other information is needed for conciliation, Charlene Spears will be willing to fully cooperate with the FEC.

Dated this 9<sup>th</sup> day of December, 1999.

Charlene Spears, Respondent  
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Attorneys for Charlene Spears

By:   
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