

DEC 09 2003

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Harold Massey, Sr.

MUR 4818

SENSITIVE

GENERAL COUNSEL'S REPORT #12

I. ACTIONS RECOMMENDED

Accept the attached conciliation agreement.

II. BACKGROUND

MUR 4818 arose from a complaint alleging that Walt Roberts and Walt Roberts for Congress ("the Committee") knowingly and willfully violated 2 U.S.C. § 441a(f). Through this Office's investigation, we discovered that Gene Stipe was at the center of multiple schemes that transferred funds from Stipe into the Committee, while hiding Stipe as the true source of the contributions. One scheme included recruiting intermediaries, such as Harold Massey, Sr., to whom Stipe gave thousands of dollars. Massey then funneled Stipe's money to straw contributors so as to make the contributions appear as if they were legitimate.

On October 9, 2003, the Commission found reason to believe that Harold Massey, Sr. knowingly and willfully violated 2 U.S.C. § 441f by assisting Stipe in the making of excessive contributions in the names of others and entered pre-probable cause conciliation.

III. DISCUSSION

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT
2003 DEC 10 A 11:29

5-15-04 10:44

This Office recommends the Commission accept the attached conciliation agreement, close the file as to Massey, and approve the appropriate letter.

IV. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Harold Massey, Sr.
2. Close the file as to Harold Massey, Sr.
3. Approve the appropriate letter.

Lawrence H. Norton
General Counsel

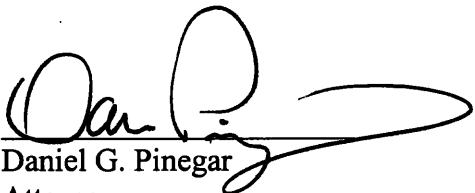
12/9/03
Date

BY:

Rhonda J. Vosdign
Rhonda J. Vosdign
Associate General Counsel
for Enforcement

Jonathan A. Bernstein
Jonathan A. Bernstein
Assistant General Counsel

Margaret J. Toalson
Margaret J. Toalson
Attorney



Daniel G. Pinegar
Attorney

1
2
3
4
5
6
7
8

- Attachment:
1. Conciliation Agreement and Check

24-03-408-137