



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Jeanette Schmidt, *et al.*) MUR 6494
)
)

**STATEMENT OF REASONS OF
VICE CHAIR CAROLINE C. HUNTER AND
COMMISSIONERS LEE E. GOODMAN AND MATTHEW S. PETERSEN¹**

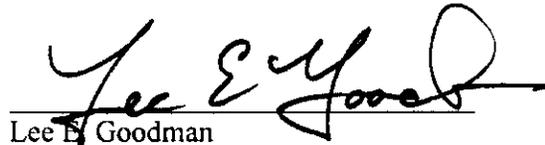
In this matter, we voted to find reason to believe that respondents violated the Act and to accept conciliation agreements between the Commission and respondents. We did not, however, agree with the Office of General Counsel's recommendation to find that Jeanette Schmidt personally and knowingly and willfully violated 52 U.S.C. § 30118(a). The evidence did not convince us that a knowing and willful finding was warranted. The provision and acceptance of legal services by public officials and candidates is a vague area of law. Moreover, we considered a knowing and willful finding here unnecessary to vindicate the Act.

¹ Although we present this clarification of our position in this matter, statements of reasons in these circumstances likely are not required by the Act. Section 30109(8)(A) gives "[a]ny party aggrieved by an order of the Commission dismissing a complaint" a cause of action to challenge the Commission's action. However, this complaint was not dismissed: The Commission received a complaint, made reason-to-believe findings, and conciliated with respondents — just not against Schmidt personally.



Caroline C. Hunter
Vice Chair

2/16/17
Date



Lee E. Goodman
Commissioner

Feb. 16, 2017
Date



Matthew S. Petersen
Commissioner

FEB. 16, 2017
Date