

STATEMENT OF PAT FIORI

I am a partner at Utrecht & Phillips, PLLC, where I practice in the areas of federal and state election law, campaign finance, ethics and lobbying laws. I regularly advise clients and represent them before the Federal Election Commission and before Congressional committees.

I previously served on the staff of the Federal Election Commission as Assistant General Counsel for Regulations and Legislation. I also worked as Executive Assistant to Commissioner John W. McGarry. I served as counsel the Clinton/Gore '92 and '96 campaigns, the Gore/Lieberman 2000 campaign, and the presidential primary campaigns of John Edwards in 2004 and 2008.

I have been asked by counsel to Senator Edwards to offer my legal opinion regarding payments that were made by Bunny Mellon and Fred Baron for Rielle Hunter's expenses in 2007 and 2008. Had I been asked for my legal opinion at the time the payments were made, I would have advised that based upon all of the FEC interpretations, including the Advisory Opinion issued to Philip Harvey, the payments for Ms. Hunter's expenses were not campaign contributions.

Based on my expert knowledge and experience with campaign finance law, I continue to believe today that the Mellon-Baron payments were not campaign contributions.

Patricia A. Fiori