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FEDERAL ELECTION  
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COUNSEL

November 1, 2006

2006 NOV -31A 9:43

Lawrence H. Norton, Esq.  
General Counsel  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

MUR # 5838

Re: Complaint against Stephen Harrison, Friends of Stephen Harrison,  
Alice Harrison as Treasurer

Dear Mr. Norton:

I, Brian J. Kaszuba, counsel for Stephen Harrison, Alice Harrison as Treasurer and Friends of Stephen Harrison, respectfully file this reply brief in response to the complaint filed against each of the respondents, by Vincent Ignizio, Chairman of the Richmond Republican County Committee. The Complaint which was postmarked on October 17, 2006 was received on October 19, 2006 by each of the respondents.

The complaint against Stephen Harrison and Alice Harrison as Treasurer should be dismissed for failure to state a claim. The complaint alleges that four violations were committed by Friends of Stephen Harrison (hereinafter "FSH"), however, no specific violation is cited in the complaint in reference to the other parties, Stephen Harrison and Alice Harrison as Treasurer. Therefore, I move to dismiss this complaint against these two parties, respectfully.

Each of the alleged violations against FSH will be addressed in the order they appear in the complaint.

1) Failure to report either payment for or an in-kind contribution of office space from the candidate's place of employment.

FSH did not fail to disclose any rent payments made to the Law Office of Stephen Harrison. No rent was paid by FSH to the Law Office of Stephen Harrison. By law, a candidate is allowed to contribute as much to his own campaign as he/she so wishes. Since the Law Office of Stephen Harrison is the personal office of Stephen Harrison, the candidate, it does not violate any limits associated with an in-kind contribution from another party.

The use of the Law Office of Stephen Harrison by FSH is not an impermissible corporate contribution under 2 U.S.C. §441b (a). The Law Office of Stephen Harrison is not an incorporated entity. It is neither a P.C. nor an L.L.C. and therefore no FEC law is violated.

Furthermore, the value of the office space is extremely low. It is not a rentable space. Its simply excess space in the law office.

2) Acceptance of impermissible corporate contributions via campaign committees for State elections.

Federal law does indeed prohibit corporations from making contributions to candidates for federal office. However, in both cases, the contributions were made by legitimate political committees. These political committees obtain their money through various means. Whether or not some of the money that makes up these political committees are corporate contributions does not in itself constitute any such federal violation. There is no evidence presented by the complainant to suggest that any specific corporate money was funneled through these political committees to FSH. In fact, the complainant does not even cite any specific law that makes the acceptance of a contribution from a political committee that may have accepted corporate funding illegal.

Furthermore, if in fact the contribution was derived from individual contributions to the political committee and not from corporate contributions, then there is no issue at all. Therefore, this allegation should be dismissed.

3) Acceptance of donations from an unregistered, illegal campaign committee.

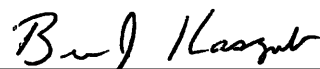
FSH did not receive contributions from an unregistered committee. Friends of Ralph Perfetto was not discontinued in 1997. It has been active and has filed reports with the State every year as it is required to do by the New York State Board of Elections. It is also our understanding that Ralph Perfetto under separate cover addressed this issue. Ralph Perfetto was advised after the receipt of this complaint to take any necessary actions necessary to register directly with the F.E.C.

4) Acceptance of contributions from State committees for judiciary elections.

The complainant fails to address this allegation at all within its complaint. Therefore, we move that this allegation should be dismissed for failure to state a claim.

Signed at Brooklyn, NY  
City, State

this 1<sup>st</sup> day of November, 2006.

  
\_\_\_\_\_  
Brian J. Kaszuba  
Of Counsel

Brian J. Kaszuba, Esq  
C/O Friends of Stephen A. Harrison  
Attorney for the Respondents  
Stephen Harrison, Alice Harrison as Treasurer, and Friends of Stephen Harrison  
544 Bay Ridge Parkway  
Brooklyn, NY 11209  
(718) 836-0760

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FEDERAL ELECTION COMMISSION

999 E Street, NW

Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL  
Please use *one* form for each Respondent/Client  
FAX (202) 219-3923

MUR # 5838

NAME OF COUNSEL: Brian J. Kaszuba

FIRM: OF Counsel

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The above-named individual and/or firm is hereby designated as my  
counsel and is authorized to receive any notifications and other communications  
from the Commission and to act on my behalf before the Commission.

10/29/06  
Date

[Signature]  
Respondent/ Client Signature

Candidate  
Title

RESPONDENT/CLIENT Stephen A. Harrison  
(Please Print)

MAILING  
ADDRESS: 544 Bay Ridge Parkway

Brooklyn NY 11209

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Information is being sought as part of an investigation being conducted by the Federal Election Commission and the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation



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The above-named individual and/or firm is hereby designated as my  
counsel and is authorized to receive any notifications and other communications  
from the Commission and to act on my behalf before the Commission.

10/25/06 [Signature] Treasurer  
Date Respondent/ Client Signature Title

RESPONDENT/CLIENT Friends of Stephen Harrison  
(Please Print)

MAILING ADDRESS: 544 Bay Ridge Parkway, Brooklyn NY 11209

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The above-named individual and/or firm is hereby designated as my  
counsel and is authorized to receive any notifications and other communications  
from the Commission and to act on my behalf before the Commission.

10/25/06 Alice Harrison TREASURER  
Date Respondent/ Client Signature Title

RESPONDENT/CLIENT Alice Harrison  
(Please Print)

MAILING  
ADDRESS: \_\_\_\_\_

Brooklyn NY 11209

TELEPHONE- HOME

BUSINESS (212) 770-3023

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