

May 24, 2010

Jeff S. Jordan
Supervisory Attorney,
Complaints Examination & Legal Administration
Federal Elections Commission
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION

2010 JUN -1 AM 2:08

OFFICE OF GENERAL
COUNSEL

Dear Mr. Jordan:

Re: MUR # 0287- LIBERATORE FOR CONGRESS COMMITTEE

Pursuant to your letter of May 13, 2010, the Liberators for Congress Committee (Committee) hereby responds to the complaint dated April __ 2010 and received by the Federal Elections Commission (FEC) on May 6, 2010. As the real party in interest this response shall serve as the response for all parties named in the complaint.

We assert that all of the allegations are untrue, ill timed and seem to be part of a pattern of harassment designed to discredit the Liberatore Campaign. We urge the FEC to dismiss the complaint and stand ready to defend the actions of the Committee.

In the course of the complaint the complainant alleges that the Committee violated the Federal Election Campaign Act of 1971, as amended, (the Act) by a "Failure to Timely File a Quarterly Report."

This is an incorrect statement.

I prepared the first quarter 2010 FEC form 3 using the FEC supplied FECFile software and prepared to send it electronically on April 15, 2010, as required by the Act. I discovered that I was unable to file it using the TCP process and therefore used the alternative method of delivery prescribed by FEC regulations: I mailed it on compact disk via USPS Express mail (Receipt #EG 320704537 US) to the Electronic Filing Office of the FEC at 8:10 PM PST (21:10 EST) on April 15, 2010. This was in full compliance with the Act. On April 19, 2010 I received a telephone call from Stephanie Shaw of the Electronic Filing Office; she confirmed the timely receipt of my disk and we discussed my inability to file through

11044290223

Jeff S. Jordan, FEC- MUR #6287
Liberators for Congress Committee-2010
5/26/10
Page 2 of 3

the Internet. After several minutes, she talked me through the process and my technical issues and she then asked me to electronically transmit the report, which would obviate the need for her to import the file into the FEC database. I did so.

The complaint also alleges that Campaign received "illegal corporate contributions" in violation of the Act.

We acknowledge that these contributions were received by the campaign. They were made by friends of the candidate who were unaware of the prohibition on direct corporate contributions to the candidate. Upon discovery that the contributions might be from a prohibited source, we followed the process required by 11 CFR 103.3(b)(1); We deposited the items, we sought to determine that the contribution were indeed illegal, we did not expend the funds, and reported them as possible illegal sources on our 4/15/10 FEC3 form. (as the complaint verifies) Upon confirmation that the funds were from prohibited sources, we returned them to the contributors in full. These expenditures will be disclosed on our next required report on May 27, 2010, as the returns occurred after the 3/31/10 closure date of the previous filing.

The complaint further alleges that a "Contribution or Expenditure for a Campaign Bus" is illegal. This allegation is completely baseless. By their own allegation this expenditure occurred on April 6, 2010, *after the closing date of the previous filing period*. This expenditure is required to be disclosed on the pre-election filing due May 27, 2010.

The final allegation cites the Committee for "Failure to Report In-Kind Corporation [sic] Contributions." This is truly a wild accusation. The allegation states that the letter in question was clearly marked "Paid for by the Liberators for Congress Committee-2010." It is a campaign mailer paid in full by the Committee. No contribution of either cash or in-kind was made by IRS Problem Solvers, Inc. (The candidate's private corporate business.) Further, the allegation correctly states that the letter was sent to the candidate's fellow members of the Brea Chamber of Commerce- a membership organization. His letter was sent to the restricted class of this membership organization, which under the Act allows for the coordination between the member, IRS Problem Solvers, Inc. and the Committee, and

11044290224

Jeff S. Jordan, FEC- MUR #6287
Liberators for Congress Committee-2010
5/26/10
Page 3 of 3

the express advocacy of his candidacy (11 CFR 114.3(a). Further, in compliance with the Act, no fundraising solicitation that contained the corporate logo, trademark or name of the IRS Problem Solvers, Inc. was included in this mailing.

Individually, these allegations could be view as the result of a hypersensitive individual who has a vexatious need to file complaints against my candidates. We believe he also filed MUR # 6258 against the Committee in March. Collectively they are indicative of a deliberate pattern to use the FEC and the Act as a weapon in the campaign for the 42nd Congressional District. We would hope that the FEC would factor this point into its decision and dismiss the complaints, finding that no further action or expense is warranted.

The foregoing is correct and accurate to the best of my knowledge, information and understanding.

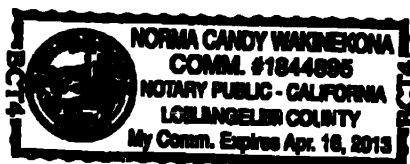
Respectfully submitted,



Louis G. Baglietto, Jr., Treasurer
Liberators for Congress Committee-2010
4331 E. Elko Street
Long Beach CA 90814
(310)748-9023

Cc: Frankie D. Hampton via email: _____

Sworn to and subscribed before me this 26 day of May, 2010.



Norma Candy Wainewkena
Notary Public

My Commission Expires: April 16, 2013

11044290225