

RECEIVED
FEC MAIL CENTER
2010 SEP 27 PM 1:05

PALAZZO FOR CONGRESS
13155 Highway 67, Suite B
Biloxi, Mississippi 39532

September 24, 2010

Federal Election Commission
Attn: Jeff S. Jordan, Attorney
999 East Street, NW
Washington, DC 20463

RE: MUR 6364

Dear Mr. Jordan:

I am writing this letter in response to your September 8, 2010, letter (copy attached) regarding the above referenced matter.

For the reasons more specifically discussed below, as treasurer of the Palazzo for Congress campaign, this letter will confirm that, with regard to this matter, I have not violated the Federal Election Campaign Act of 1971, as amended ("the Act").

For the record, my assistant and I have attended two FEC continuing education seminars, the latest of which was in San Francisco on October 28-29, 2009. We are very careful to use the information learned at these seminars to help ensure that we fully comply with all aspects of all federal laws and regulations.

Quite frankly it is really difficult for me to understand and respond to the attached complaint filed by Mr. Richard W. Keffer because it fails to provide details and simply uses the word, "suspicious." Notwithstanding his lack of details, as I understand the complaint, he is supposedly alleging that the listed contributions were made by one person in the name of another. I have carefully investigated his allegation and, based on my investigation, can assure you that it is without basis and is simply not true.

As part of my job as treasurer, my assistant and I carefully review all contributions to ensure that they are legal and proper. With regard to the specific contributions listed in the attachments, at no time did we consider the contributions to be questionable. Since they were not considered questionable, we did not deem it necessary to institute the follow-up procedures detailed on page 31 of the Federal Election Commission Guide.

RECEIVED
FEDERAL ELECTION
COMMISSION
2010 SEP 28 AM 10:50
OFFICE OF GENERAL
COUNSEL

11044294167

Federal Election Commission

September 24, 2010

Page 2

Upon receiving this complaint, and to give me an even higher level of assurance, we asked each contributor listed to provide a signed affidavit confirming that the amounts given were not made by one person in the name of another.

To date, we have received ten affidavits (which are attached), as follows:

1. Lee Hertz
2. Eugene Land
3. Mary Morrison
4. Virginia Roberts
5. Edna Scoggins
6. Commercial Real Estate Advisors, LLC
7. Richard Boone
8. Lindsey Stevens
9. Misty's House of Style
10. Frank Palazzo, III

We are actively attempting to obtain the other affidavits. When they are received, we will forward them to you.

I trust that the above explanation is sufficient to verify that Mr. Keffer's allegation is not true. If you need any additional information, please call me.

Thank you for your favorable response to the above.

Sincerely yours,

PALAZZO FOR CONGRESS



Paul V. Breazale
Treasurer

Enclosures

11044294168

PALAZZO FOR CONGRESS
13155 Highway 67, Suite B
Biloxi, Mississippi 39532

September 24, 2010

Federal Election Commission
 Attn: Jeff S. Jordan, Attorney
 999 East Street, NW
 Washington, DC 20463

RE: MUR 6364

Dear Mr. Jordan:

This letter is written in response to your September 8, 2010, letter regarding the above referenced matter.

Along with the campaign's treasurer, Paul V. Breazeale, who has written a separate letter to you, this letter will confirm that, with regard to this matter, I have not violated the Federal Election Campaign Act of 1971, as amended ("the Act").

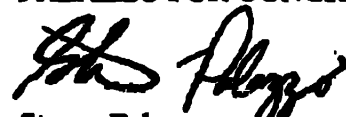
We are pleased that, from the outset, our campaign team has been exceptionally careful to fully comply with all aspects of all federal laws and regulations. To provide evidence of such compliance, and with regard to the above referenced matter, we have obtained affidavits from the donors listed in the complaint.

I trust that the above affidavits are sufficient to verify that Mr. Keffer's allegation is not true. If you need any additional information, please call us.

Thank you for your favorable response to the above.

Sincerely yours,

PALAZZO FOR CONGRESS



Steven Palazzo
 Candidate for Congress

11044294169

September 15, 2010

Federal Election Commission
Attn: Jeff S. Jordan, Attorney
999 East Street, NW
Washington, DC 20463

RE: MUR 6364

Dear Mr. Jordan:

I am writing this letter in response to your September 8, 2010, letter regarding the above referenced matter.

As confirmed on the attached affidavit, the ilsted contribution was made by me and is not a contribution made by one person in the name of another as the complaint alleges.

I trust that the above explanation is sufficient to verify that Mr. Kieffer's allegation is not true. If you need any additional information, please call me.

Thank you for your favorable response to the above.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Lee Hertz", with a stylized flourish at the end.

Lee Hertz

11044294170