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OFFICE OF GENERAL
COUNSEL

January 21, 2011

Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: Complaint MUR#6437

Dear General Counsel,

I am providing this information in response to the above referenced complaint.

I was not involved in the activities related to the creation and airing of the commercial that is the subject of the complaint other than reviewing the invoices presented by the vendor and reporting the payments to the vendor to the FEC in the appropriate filing.

The Committee made payments to Jamestown Associates for services provided in support of Karen Harrington's campaign for House of Representatives District 20. I reviewed these invoices and they appeared to be for services in connection with a campaign for Federal office. These services include the commercial that is the subject of the complaint.

A yahoo search of this vendor indicates that Jamestown Associates is a "Full-Service Republican political consulting firm specializing in direct mail, television and radio production, and general strategic consulting."

U.S.C Section 439a.(a)(1) states:

"A contribution accepted by a candidate, and any other donation received by an individual as support for the activities of the individual as a holder of Federal office, may be used by the candidate or individual

(1) For otherwise authorized expenditures in connection with the campaign for Federal office of the candidate or individual;

I believe the payments to Jamestown Associates are in compliance with the above.

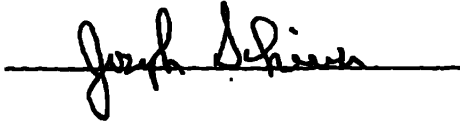
The complaint alleges that U.S.C Section 439a.(b) (1) and (2) were violated. Paragraph (2) states:

"For the purposes of paragraph (1), a contribution or donation shall be considered to be converted to personal use if the contribution or amount is used to fulfill any commitment, obligation, or expense of a person that would exist irrespective of the candidate's election campaign..."

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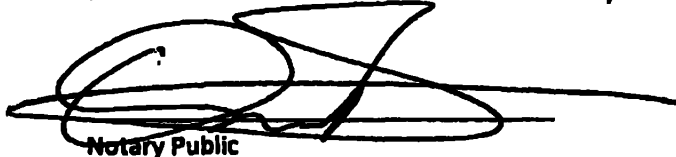
I have no reason to believe that Karen Harrington would have made these payments to Jamestown Associates if not for her election campaign.

Sincerely,



Joseph Schirra
Campaign Treasurer
Karen Harrington for Congress, Inc.
2008 NW 150th Ave
Suite 2120
Pembroke Pines, FL 33028

SIGNED AND SWORN to before me this 21st day of January, 2011



Notary Public

My Commission Expires:

NOTARY PUBLIC - STATE OF FLORIDA

Oral Beason



Commission #DD633688

Expires: MAR. 10, 2011

BONDED THRU ATLANTIC BONDING CO., INC.

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