

Karen Hartley-Nagle

DEMOCRAT FOR CONGRESS

www.hartley-nagle.com

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

2008 OCT -6 P 1:55

September 29, 2008

Re: MUR 6066

Federal Election Commission
General Counsel's Office
Complaints Examination & Legal Administration
999 E Street NW
Washington, DC 20463

Attn: Mr. Jeff S. Jordon

Sent via Fax (202 219-3923) and USPS Mail 9/29/2008

Dear Mr. Jordon,

The Karen Hartley-Nagle for Congress campaign ("the Campaign") has received your letter dated September 12, 2008 describing alleged violations of the Federal Election Campaign Act of 1971, as amended ("the Act") by former candidate for Congress in Delaware, Mr. Jerry Northington. In summary, all allegations of violation of the Act are false.

The allegations are listed individually and addressed individually as follows.

1. "Karen Hartley-Nagle is running in the Democratic primary for Delaware's at large congressional seat". Admitted.
2. "Ms. Hartley-Nagle has failed to file the required FEC disclosure form on 8/20/2008. Admitted. Treasurer, Mr. Michael Dore's computer suffered from a virus attack which delayed the filing of the report. A revised deadline of September 5, 2008 was provided by the FEC and the Campaign filed in accordance with the revised deadline.
3. "Ms. Hartley-Nagle's campaign has purchased lawn signs and engaged in other campaign activities, such as opening an office and maintaining a campaign website (www.hartley-nagle.com) that require campaign finances." Admitted. The invoices paid to date as reflected in the last filing with the FEC reflect accurately the expenses paid to date for campaign activities. Invoice's for the office space have yet to be submitted to the campaign, signage expenditures were reflected in the last filing with the FEC and maintenance to the website is being done on a volunteer basis.
4. "Such finances are required to be disclosed under federal campaign finance law." Admitted.
5. "Ms. Hartley-Nagle has publicly stated that she has raised in excess of \$100,000.00 in donations and hired the services of a Washington, D.C., based campaign consultant, although she has not reported those details on required federal campaign forms." Denied. Mr. Northington's claims of the Campaign raising in excess of \$100,000.00 is Denied. Mr. Northington's claim that in excess of \$100,000.00 has been raised by the Campaign and this was publically stated is Denied. The Campaign would suggest this claim is an outright falsehood and Mr. Northington putting this claim in writing without

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any documentation to support his claim may border on perjury. Mr. Northington's claim reads "publically stated" and he should amend his complaint to offer evidence of this "publically stated" fact. Otherwise, dismissal of his complaint is requested. Mr. Northington's claim of "hired the services of a Washington, D.C., based campaign consultant, although she has not reported those details on required federal campaign forms" is Denied. The Campaign has recently expended funds on a Washington, D.C. based campaign consultant and this expenditure will be shown in the October 15, 2008 filing with the FEC.

6. "Complainant has witnessed the use of campaign material and heard Ms. Hartley-Nagle's claims about fundraising and consultants." Admitted in part and Denied in part. Admitted the campaign has used campaign materials as reported with the FEC for campaign materials through HotCards.com. Denied Mr. Northington's "claims he heard Ms. Hartley-Nagle claims about fundraising and consultants". All filings with the FEC thus far accurately reflect the fundraising activity and expenditures of the Campaign. Mr. Northington's claims of violations are false.
7. "Ms. Hartley-Nagle has run a federal campaign in the past and should be familiar with campaign finance disclosure laws". Admitted.
8. "The address of Ms. Hartley-Nagle's Campaign office is 964 Justison St., Wilmington, DE 19801. Admitted.

Mr. Northington's claims, on their face are fabricated falsehoods that cannot be substantiated by his own filing and it is requested his claim be dismissed.

Sincerely,



Michael R. Dore
Treasurer

CC: Karen Hartley-Nagle
Brenda L. Irwin
FILE

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