

PERKINS COIE LLP

607 FOURTEENTH STREET, N.W. • WASHINGTON, D.C. 20005-2011  
TELEPHONE: 202 628-6600 • FACSIMILE: 202 434-1690

Robert F. Bauer  
PHONE: 202/434-1602  
FAX: 202/434-1690  
EMAIL: Rbauer@perkinscoie.com

October 25, 2002

**By Hand Delivery**

Mr. Albert R. Veldhuyzen  
Office of the General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

2002 OCT 25 P 2 36

**Re: MUR 5279 (Melvin Scheinerman et al.)**

Dear Mr. Veldhuyzen:

This letter constitutes the consolidated response of the individual respondents this office represents in the above matter ("Respondents") to the Commission's letter of October 3, 2002. As we indicated in the Consolidated Response filed on September 23, 2002, we have been continuing to develop and assemble documentation supporting the identification of the partners and specific partnerships at issue. See Consolidated Response of Certain Respondents to "Reason to Believe" at 4 n.4. We are providing today additional and extensive documentation to supplement the Consolidated Response, which will address most of the outstanding questions raised in your October 3 letter. As noted below, there is one additional factual issue outstanding from our review, and we expect to have a response on this issue, as well, in short order.

The Commission, in its various "reason to believe" notifications and again in its October 3 letter, expresses concern that the funds for each partnership contribution at issue in this matter did not originate from the partnership funds of the individual attributed partner. See, e.g., Letter from Albert R. Veldhuyzen, attorney, Federal Election Commission, to Robert F. Bauer, attorney, Perkins Coie LLP 1 (October 3, 2002). Respondents submit the attached documentation, establishing for the specified cases that the attributed partner was indeed a partner in the partnership that made the

contribution so attributed, and that the funds comprising each contribution were drawn from the partnership funds of the attributed partner in each case.<sup>1</sup>

For this purpose, Respondents attach Internal Revenue Service Schedule K-1s for 1999, see Schedule K-1s, Exhibit A. The Schedule K-1s indicate that in each case, the attributed individual partner held either a partnership interest in the contributing partnership, or was a partner in a partnership that held a partnership interest in the contributing partnership. Respondents also attach additional documents that, read together with the Schedule K-1s, indicate that each partnership's contribution was properly deducted from the attributed partner's partnership account. Where relevant, Respondents attach a General Ledger report for each contributing partnership. See General Ledger reports, Exhibit B. Each General Ledger report reflects the deduction from the partnership account resulting from the partnership's contribution to Bradley, for President, Inc. (the "Bradley Committee"), which is identifiable by check number. Respondents also attach, as Exhibit C, the spreadsheet prepared at the time the contributions were made, and delivered to the Bradley Committee, which reflects the determination of the individual attributions for these contributions. See Attribution Spreadsheet, Exhibit C. Finally, each Schedule K-1 reflects, in Section J(d) indicating "Withdrawals and distributions," that the contribution was correspondingly deducted from the individual partner's partnership funds. See Schedule K-1s, Exhibit A.

During the course of our review, we have discovered that the individual partnerships did err in the attributions affecting four of these partnerships. As a result of apparent clerical errors, the contributions made by Dara Building Associates, Montgomery Associates LP, Pitney Farms Associates, and Randolph Building Associates LP were mistakenly attributed to individuals who, although partners of the respective contributing partnerships in previous years, were not partners at the time these contributions were made. Additionally, we are reviewing the records relating to the contribution made by a fifth partnership, BP Developers, LP, and attributed to Shellie Laulicht. Once we have, in short order, completed this review, we will provide

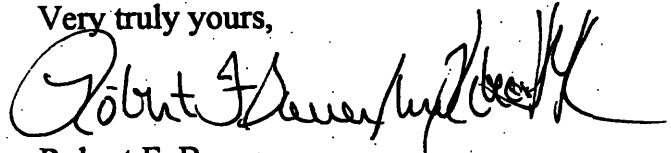
---

<sup>1</sup> The contributing entities at issue here are several independent limited liability companies ("L.L.C.s"), limited partnerships, and general partnerships. As Respondents noted in their Consolidated Response, all of the entities have elected tax treatment as partnerships, and the L.L.C.s at issue have each elected partnership status for federal taxation purposes. Consolidated Response at 3 n.3, 8 n.6. For these reasons, and in the interest of simplicity, as did the Consolidated Response, this document will refer to all entities as "partnerships."

Mr. Albert R. Veldhuyzen  
October 25, 2002  
Page 3

all the relevant results of this review to the Commission. Please do not hesitate to call us should you have further questions.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Robert F. Bauer", with a stylized flourish at the end.

Robert F. Bauer

RFB:rg  
Attachments

2002-10-25 14:03:23