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MEMORANDUM

JUL 18 2002

TO: The Commission

FROM: Lawrence H. Norton
General Counsel

BY: Gregory R. Baker *GRB*
Acting Associate General Counsel

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SUBJECT: Bill Bradley for President, Inc. (MUR 5279) — Amended Factual and Legal Analyses

On June 26, 2002, the Commission found reason to believe Bill Bradley for President, Inc. ("the Committee") and Theodore V. Wells, as Treasurer, violated several provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") and Commission regulations. In addition, the Commission made reason to believe findings against the Kushner Companies, associated partnerships, and numerous individual contributors. The Commission also approved the proposed subpoenas and Factual and Legal Analyses as recommended in the General Counsel's Report dated May 29, 2002.

Language deleted from the final version of the First General Counsel's Report was inadvertently included in the proposed Factual and Legal Analyses for Kushner Companies and associated partnerships, Jeffrey Freireich, Charles Kushner, Richard Stadtmayer and Scott Zeher. Attachment 1 at 9 (lines 1-7). However, the additional language was not the basis for the Commission's reason to believe finding. Therefore, the Office of General Counsel recommends the Commission approve the amended Factual and Legal Analyses. Attachment 2-6.

RECOMMENDATION

Approve the attached amended Factual and Legal Analyses for Kushner Companies and associated partnerships, Jeffrey Freireich, Charles Kushner, Richard Stadtmauer, and Scott Zecher.

Attachments

1. Factual and Legal Analyses for Kushner Companies and associated partnerships, approved by the Commission on June 26, 2002.
2. Amended Factual and Legal Analyses for Kushner Companies.
3. Amended Factual and Legal Analyses for Jeffrey Freireich.
4. Amended Factual and Legal Analyses for Charles Kushner.
5. Amended Factual and Legal Analyses for Richard Stadtmauer.
6. Amended Factual and Legal Analyses for Scott Zecher.

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