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September 23, 2002

Via Federal Express

Albert Veldhuyzen, Esq.
General Counsel's Office
Federal Election Commission
999 E. Street NW
Washington, D.C. 20463

Re: MUR 5279
Bill Bradley for President, Inc.

Dear Mr. Veldhuyzen::

We have been asked to represent Scott Zecher who received a "reason to believe" letter dated July 26, 2002 and enclose for your files a Statement of Designation of Counsel executed by Mr. Zecher.

We also enclose for your review a copy of a Declaration executed by Mr. Zecher on September 23, 2002. It is clear from a review of the Declaration that Mr. Zecher played no role in connection with any contributions which were made to the Bradley Committee that are the subject of the Commission's current inquiry. While Mr. Zecher currently oversees accounting services Westminster provides to various real estate partnerships and limited liability companies, he did not begin to perform these tasks until August, 1999, well after the time in which these contribution were made.

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

2002 SEP 24 A 11:42

SAIBER SCHLESINGER SATZ & GOLDSTEIN, LLC

Albert Veldhuyzen, Esq.

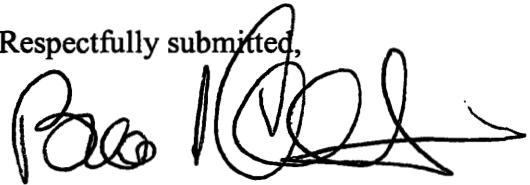
September 23, 2002

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The Federal Election Commission's letter of July 26, 2002 advises that the Commission found that there was reason to believe that Mr. Zecher violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 114.2(a) by consenting to corporate contributions acted as a corporate conduit in violation of 11 C.F.R. § 110.6(b)(2)(ii); facilitated the making of contributions in violation of 11 C.F.R. § 114.2(f) and violated 2 U.S.C § 441f and 11 C.F.R. § 110.4(b)(1)(iii) by knowingly assisting and make contributions in the name of another.

Since it is clear that Mr. Zecher played no such role in the company at the time of these contributions were made, we respectfully request the Commission to dismiss Mr. Zecher from this ongoing inquiry.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Bruce I. Goldstein", with a long horizontal flourish extending to the right.

BRUCE I. GOLDSTEIN

BIG:pn

Encs.

STATEMENT OF DESIGNATION OF COUNSEL

MUR 5279

NAME OF COUNSEL: Bruce I Goldstein

ADDRESS: Saiber Schlesinger Satz & Goldstein
one Gateway Center
Newark, New Jersey 07102

TELEPHONE: 973-622-3333

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

9/12/02
Date

[Signature]
Signature

RESPONDENT'S NAME: Scott Zecker

ADDRESS:

[REDACTED]
[REDACTED]

HOME PHONE:

[REDACTED]

BUSINESS PHONE:

[REDACTED]

24 34 403 2466

**FEDERAL ELECTION COMMISSION
MATTER UNDER REVIEW 5279**

DECLARATION OF SCOTT ZECHER

1. My name is Scott Zecher. I am employed by Westminster Management LLC ("Westminster") where I oversee the accounting services Westminster provides to various real estate partnerships and limited liability companies. I assumed responsibility for these activities in August, 1999 and, therefore, had no involvement in any contributions which were made to the Bradley Committee that are the subject of the Commission's current inquiry. I was not involved in making those contributions and this Declaration is based upon the knowledge I have acquired in my capacity as custodian of Westminster's accounting and financial records and my review of those records and the records of other affiliated entities.

2. Westminster contracts with various real estate enterprises to provide a full range of management services. Among the services Westminster provides these partnerships and limited liability companies are accounting, tax and fiscal services. Westminster has contracts to provide these services to the real estate partnerships and limited liability companies that made the financial contributions referenced in Exhibit B of the Federal Election Commission's July 26, 2002 letter to Charles Kushner on behalf of Kushner Companies.

3. Based upon my review of Westminster's records, in the course of providing its accounting services, Westminster issued checks to the Bradley for President Committee on behalf of the partnerships and limited liability companies identified on the FEC's Exhibit B. Each contribution was issued on a check drawn from the respective partnership's or limited liability company's separate checking account. No check was drawn from a corporate account.

4. Based upon my review of Westminster's records, in June of 1999, it was Westminster's practice, upon receiving a request for a political contribution, to attribute the contribution to an individual partner of the contributing partnership or limited liability company as designated by the partnership or company and to reflect the political contribution so attributed in the K-1 Schedule of the partnership.

5. Based upon my review of Westminster's records, in the case of the political contributions shown on Exhibit B of the FEC's July 26, 2002 letter, none of these contributions was attributed to a corporate managing partner or drawn from a corporate managing partner's capital account.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct. Executed on September 23, 2002.


SCOTT ZECHER