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**VAN NESS FELDMAN, P.C.**

POLITICAL ACTION COMMITTEE  
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 10007  
 212-697-6800  
 Fax: 202/338-2416

February 28, 2003

Brandy Phillips  
 Campaign Finance Analyst  
 Reports Analysis Division  
 Federal Election Commission  
 Washington, DC 20463

Re: Identification Number C00205369

Dear Ms. Phillips:

This letter is in response to your letter to Thomas C. Roberts, Treasurer, Van Ness Feldman, P.C. Political Action Committee ("VNF PAC"), dated February 12, 2003. This letter was prompted by the Federal Election Commission's ("FEC") preliminary review of VNF PAC's October 2002 monthly report. The letter raised questions concerning certain information included in that report.

According to your letter and attachments thereto, the Commission's preliminary review of VNF PAC's October 2002 monthly report raised questions regarding certain contributions disclosed in that report that appear to reflect payments to VNF PAC's connected organization (i.e., Van Ness Feldman, P.C.). Due to a clerical error, these contributions were incorrectly disclosed. None of the itemized disbursements disclosed in Schedule B to VNF PAC's October 2002 monthly report were made to the connected organization. Rather, in each case, the contribution was made to the respective candidate committee of the candidate indicated under "Candidate Name." VNF PAC is filing an amendment to its October 2002 monthly report to make the appropriate corrections.

Your letter and attachments thereto also raise questions regarding several contributions made by VNF PAC to Craig for U.S. Senate, including one contribution dated September 19, 2002. Your letter suggests that this contribution appears to have exceeded the FEC's contribution limits with regard to the 2002 general election. Due to a clerical error, this contribution was incorrectly disclosed. A contribution made by VNF PAC to Craig for U.S. Senate, dated September 19, 2001, and reported in VNF PAC's January 31, 2002 quarterly report (2001 year end report), was inadvertently and incorrectly included a second time, with the wrong date, in VNF PAC's October 2002 monthly report. However, no additional contribution was actually made to Craig for U.S. Senate. Therefore, VNF PAC's contributions to Craig for U.S. Senate are properly

within the FEC's contribution limits. VNF PAC is filing an amendment to its October 2002 monthly report to make the appropriate corrections.

Thank you for bringing these matters to our attention. Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "T.C. Roberts". The signature is fluid and cursive, with the first name "T.C." being more distinct than the last name "Roberts".

Thomas C. Roberts  
Treasurer

Federal Election Commission

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