# ETEXT ATTACHMENT

**10/15/2003 22 : 44**

October 15, 2003

Ms. Kristen Davis

Reports Analysis Division

Federal Election Commission

999 E Street, NW

Washington, DC 20463

Re: C00363317

Amended July Quarterly Report (1/01/03-6/30/03)

Dear Ms. Davis

I am writing in response to your letter dated September 24, 2003 concerning the above report filed by Jerry's Political Action Committee ("Jerry's PAC"). In your letter you questioned whether contributions from two partnerships were in fact contributions from corporations that are prohibited under the Federal Campaign Act (2 USC 441b[a]). I want to assure you that both referenced contributions were in fact from limited liability companies (LLC's) that choose to be treated as a partnership under the Internal Revenue Service rules, and thus their contributions are permissible.

Seventh Chelsea Associates, LLC is a New York domestic Limited Liability Company whose $2000 contribution to Nadler for Congress is attributable to Wendi S. Lazar. Van Der Moolen Specialists USA, LLC is a New York domestic Limited Liability Company, whose $3000 contribution to Nadler for Congress is attributable to thirty different partners of the LLC, each of whose contribution does not exceed $100. Thus their contribution does require itemization on the committee's report.

The Committee is acutely aware of how important it is comply with Federal Election law. Accordingly, the Committee has procedures in place to insure that we follow the law and that all receipts are within federal law and reported in accordance with the law. We are pleased that our procedures are working, and that in these two cases the committee's measures insured that the contributions from the LLC's were permissible.

I thank you for giving the Committee the opportunity to respond to the matters raised in your letter.

Yours Very Truly,

Robert M. Gottheim

Counsel