



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

July 3, 2002

Randy J. Goodwin, Treasurer
Justice-PAC
2091 E. Valley Parkway, Suite 1C
Escondido, CA 92027

Identification Number: C00159319

Reference: Year End Report (7/1/01-12/31/01)

Dear Mr. Goodwin:

On June 12, 2002 you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Please be advised that if a committee files an amendment to a report that was filed electronically, it shall also submit the amendment in an electronic format. 11 CFR §104.18(f) Your paper filing dated July 1, 2002 will not be considered an amended report. To amend your report, you must submit it in an electronic format.

An adequate response must be received at the Commission by July 23, 2002. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

If you should have any questions related to this matter, please contact Antoinette Kitchen on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Randy J. Goodwin, Treasurer
Justice-PAC
2091 E. Valley Parkway, Suite 1C
Escondido, CA 92027

JUN 19 2002

Identification Number: C00159319

Reference: Year End Report (7/1/01-12/31/01)

Dear Mr. Goodwin:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A supporting Line 17 of your report discloses a payment from Omega List Company (pertinent portion(s) attached). It appears this receipt was for goods and/or services provided by your committee. Pursuant to Advisory Opinion 1979-18, the sale/purchase price paid to a political committee could involve the receipt of a contribution from a purchaser if the purchase price exceeds the "usual and normal charge". The term "usual and normal charge" for goods is defined as the price of those goods in the market from which they ordinarily would have been purchased at the time of the contribution. Examples of goods and services include equipment, supplies, personnel, advertising services, membership lists, and mailing lists. 11 CFR §100.7(a)(1)(iii)

Please clarify whether your committee assessed the usual and normal charge for the goods and/or services you provided and explain the steps your committee took in determining the amount charged. If your committee provided the goods and/or services at more than the usual and normal charge, the difference between the two is considered to be an in-kind contribution received by your committee from a corporation and is prohibited subject to the limits set forth at 2 U.S.C. §441b(a)

-Schedule A supporting Line 11(a)(i) of your report discloses a receipt(s) from "Unitemized Contributions". Please be advised that federal regulations require the itemization of all contributions from individuals/persons that aggregate greater than \$200 in the calendar year. Please clarify whether this figure includes any receipts that aggregate greater than \$200 from an individual/person. If this is the case, please amend your report(s) by itemizing the receipts on Schedule A. 11 CFR §104.3(a)(2) Otherwise, all contributions received that aggregate \$200 or less per individual for the calendar year should be reported on Line 11(a)(ii).

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule B of your report to clarify the following description(s): "Expense Reimbursement", "Expenses", "Postage Account", "Reimbursement of Expenses", "Operating Expenses", and "Repayment of Expense". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-On Schedule B supporting Line 21(b) of the Detailed Summary Page, your committee discloses a disbursement for "Operating Expenses" and lists itself (Justice Political Action Committee) as the payee. Please clarify the nature of this transaction(s) or amend Schedule B by providing the correct name and mailing address of the payee.

A response or amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Antoinette Kitchen
Senior Reports Analyst
Reports Analysis Division

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s) or each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)	PAGE 68 / 132
	<input type="checkbox"/> 11a <input type="checkbox"/> 11b <input type="checkbox"/> 11c <input type="checkbox"/> 12	
	<input type="checkbox"/> 13 <input type="checkbox"/> 14 <input type="checkbox"/> 15 <input type="checkbox"/> 16 <input checked="" type="checkbox"/> 17	

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
Justice Political Action Committee

AK

Full Name (Last, First, Middle Initial) A. Omega List Company		Date of Receipt M M D D Y Y Y Y 07 01 2001
Mailing Address 1420 Spring Hill Rd		Amount of Each Receipt this Period 9358.44
City McLean	State Zip Code VA 22103	
FEC ID number of contributing federal political committee.		List Rental Income
Name of Employer	Occupation	
Receipt For: Primary General Other (specify) ▾	Aggregate Year-to-Date ▼ 37024.11	Transaction ID: SA17.4809

Full Name (Last, First, Middle Initial) B. Omega List Company		Date of Receipt M M D D Y Y Y Y 08 01 2001
Mailing Address 1420 Spring Hill Rd		Amount of Each Receipt this Period 805.62
City McLean	State Zip Code VA 22103	
FEC ID number of contributing federal political committee.		List Rental Income
Name of Employer	Occupation	
Receipt For: Primary General Other (specify) ▾	Aggregate Year-to-Date ▼ 37829.73	Transaction ID: SA17.4810

Full Name (Last, First, Middle Initial) C. Omega List Company		Date of Receipt M M D D Y Y Y Y 09 09 2001
Mailing Address 1420 Spring Hill Rd		Amount of Each Receipt this Period 1332.27
City McLean	State Zip Code VA 22103	
FEC ID number of contributing federal political committee.		List Rental Income
Name of Employer	Occupation	
Receipt For: Primary General Other (specify) ▾	Aggregate Year-to-Date ▼ 39182.00	Transaction ID: SA17.4811

SUBTOTAL of Receipts This Page (optional)	5496.33
TOTAL This Period (last 20 receipts number only)	

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s)
or each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 89 / 132

(check only one)
 11a 11b 11c 12
 13 14 15 16 17

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NAME OF COMMITTEE (in Full)
Justice Political Action Committee

AK

A. Full Name (Last, First, Middle Initial)
Omega Ltd Company

Mailing Address
1420 Spring Hill Rd

City State Zip Code
McLean VA 22103

FEC ID number of contributing federal political committee.

Name of Employer Occupation

Receipt For: Primary General Other (specify)

Aggregate Year-to-Date 39835.77

Date of Receipt
M / D / Y Y Y Y
10 / 07 / 2001

Amount of Each Receipt this Period
673.77

List Rental Income

Transaction ID: SA17.4612

B. Full Name (Last, First, Middle Initial)
Omega Ltd Company

Mailing Address
1420 Spring Hill Rd

City State Zip Code
McLean VA 22103

FEC ID number of contributing federal political committee.

Name of Employer Occupation

Receipt For: Primary General Other (specify)

Aggregate Year-to-Date 45203.68

Date of Receipt
M / D / Y Y Y Y
11 / 01 / 2001

Amount of Each Receipt this Period
5367.91

List Rental Income

Transaction ID: SA17.4613

C. Full Name (Last, First, Middle Initial)
Omega Ltd Company

Mailing Address
1420 Spring Hill Rd

City State Zip Code
McLean VA 22103

FEC ID number of contributing federal political committee.

Name of Employer Occupation

Receipt For: Primary General Other (specify)

Aggregate Year-to-Date 54327.77

Date of Receipt
M / D / Y Y Y Y
11 / 01 / 2001

Amount of Each Receipt this Period
9124.09

List Rental Income

Transaction ID: SA17.4614

SUBTOTAL of Receipts This Page (optional) ▶ 15165.77

TOTAL This Period (do not enter this number only) ▶

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s)
or each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 70 / 132

(check only one)
 11a 11b 11c 12
 13 14 15 16 17

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NAME OF COMMITTEE (in Full)
Justice Political Action Committee

AK

A. Full Name (Last, First, Middle Initial)
Omega List Company

Mailing Address
1420 Spring Hill Rd

City State Zip Code
McLean VA 22103

FEC ID number of contributing federal political committee.

Name of Employer Occupation

Receipt For: Primary General Other (specify)
Aggregate Year-to-Date 58038.69

Date of Receipt
M M / D D / Y Y Y Y
11 01 2001

Amount of Each Receipt this Period
3711.92

List Rental Income

Transaction ID: SA17.4815

B. Full Name (Last, First, Middle Initial)
Omega List Company

Mailing Address
1420 Spring Hill Rd

City State Zip Code
McLean VA 22103

FEC ID number of contributing federal political committee.

Name of Employer Occupation

Receipt For: Primary General Other (specify)
Aggregate Year-to-Date 58516.13

Date of Receipt
M M / D D / Y Y Y Y
12 01 2001

Amount of Each Receipt this Period
478.44

List Rental Income

Transaction ID: SA17.4816

C. Full Name (Last, First, Middle Initial)
Omega List Company

Mailing Address
1420 Spring Hill Rd

City State Zip Code
McLean VA 22103

FEC ID number of contributing federal political committee.

Name of Employer Occupation

Receipt For: Primary General Other (specify)
Aggregate Year-to-Date 82822.71

Date of Receipt
M M / D D / Y Y Y Y
12 01 2001

Amount of Each Receipt this Period
4106.58

List Rental Income

Transaction ID: SA17.4817

SUBTOTAL of Receipts This Page (optional) 8294.94

TOTAL This Period (to be reported on line number only)

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s) or each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)		PAGE 71 / 132	
	<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input checked="" type="checkbox"/> 17

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NAME OF COMMITTEE (In Full)
Justice Political Action Committee

Full Name (Last, First, Middle Initial) A. Omega Ltd Company		Date of Receipt M O D Y Y Y 12 18 2001	
Mailing Address 1420 Spring Hill Rd		Amount of Each Receipt this Period 3187.17	
City	State Zip Code		
McLean	VA 22103	List Rental Income	
FEC ID number of contributing federal political committee.		Transaction ID: SA17.4818	
Name of Employer	Occupation		
Receipt For: Primary General Other (specify) ▾	Aggregate Year-to-Date ▾ 65809.88		

AK

B.

C.

SUBTOTAL of Receipts This Page (optional)	3187.17
TOTAL This Period (Use only one number only)	32144.21

