FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Douglas White, Treasurer
Black America's Political Action Committee
2029 P Street, NW, Suite 302
Washington, DC 20036

JUN 12 2002

Identification Number: C00300921

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

Dear Mr. White:

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)

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Contributions to Federal Candidates/Committees should be properly disclosed on a separate Schedule B, supporting Line 23 of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

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,

Angel L. Williamson

Angel L. Williamson
Senior Reports Analyst
Reports Analysis Division

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

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

FOR LINE NUMBER: PAGE 195/280
(check only one)
☐ 11a ☐ 11b ☐ 11c ☐ 12
☐ 13 ☐ 14 ☐ 15 ☐ 16 ☒ 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)
BLACK AMERICA'S POLITICAL ACTION COMMITTEE

A. Full Name (Last, First, Middle Initial)
Omega List Company
Mailing Address
1420 Spring Hill Rd., Suite 480
City: McLean State: VA Zip Code: 22031
FEC ID number of contributing federal political committee.
Name of Employer | Occupation
Receipt For: Primary General
Other (specify) ▼
Aggregate Year-to-Date ▼ 21842.14
Date of Receipt: 07 10 2001
Amount of Each Receipt this Period: 11764.80
Rental Income
Transaction ID: SA17.94436

B. Full Name (Last, First, Middle Initial)
Omega List Company
Mailing Address
1420 Spring Hill Rd., Suite 480
City: McLean State: VA Zip Code: 22031
FEC ID number of contributing federal political committee.
Name of Employer | Occupation
Receipt For: Primary General
Other (specify) ▼
Aggregate Year-to-Date ▼ 25051.42
Date of Receipt: 08 11 2001
Amount of Each Receipt this Period: 3209.29
Rental Income
Transaction ID: SA17.94395

C. Full Name (Last, First, Middle Initial)
Omega List Company
Mailing Address
1420 Spring Hill Rd., Suite 480
City: McLean State: VA Zip Code: 22031
FEC ID number of contributing federal political committee.
Name of Employer | Occupation
Receipt For: Primary General
Other (specify) ▼
Aggregate Year-to-Date ▼ 37607.73
Date of Receipt: 06 30 2001
Amount of Each Receipt this Period: 12756.51
Rental Income
Transaction ID: SA17.94442

SUBTOTAL of Receipts This Page (optional) ▶ 27720.29

TOTAL This Period (last page this line number only) ▶

FEC Schedule A (Revised 1/2001)

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

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

FOR LINE NUMBER: (check only one) PAGE 195 / 280
☐ 11a ☐ 11b ☐ 11c ☐ 12
☐ 13 ☐ 14 ☐ 15 ☐ 16 ☒ 17

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NAME OF COMMITTEE (In Full)
BLACK AMERICA'S POLITICAL ACTION COMMITTEE

A. Full Name (Last, First, Middle Initial)
Omega Ltd Company
Mailing Address
1420 Spring Hill Rd., Suite 490
City: McLean State: VA Zip Code: 22031
FEC ID number of contributing federal political committee.
Name of Employer | Occupation
Receipt For: Primary General
Other (specify)
Aggregate Year-to-Date: 46679.77
Date of Receipt: 09 02 2001
Amount of Each Receipt this Period: $872.04
Rental Income
Transaction ID: SA17.94443

B. Full Name (Last, First, Middle Initial)
Omega Ltd Company
Mailing Address
1420 Spring Hill Rd., Suite 490
City: McLean State: VA Zip Code: 22031
FEC ID number of contributing federal political committee.
Name of Employer | Occupation
Receipt For: Primary General
Other (specify)
Aggregate Year-to-Date: 59580.76
Date of Receipt: 09 20 2001
Amount of Each Receipt this Period: $901.01
Rental Income
Transaction ID: SA17.94439

C. Full Name (Last, First, Middle Initial)
Omega Ltd Company
Mailing Address
1420 Spring Hill Rd., Suite 490
City: McLean State: VA Zip Code: 22031
FEC ID number of contributing federal political committee.
Name of Employer | Occupation
Receipt For: Primary General
Other (specify)
Aggregate Year-to-Date: 61691.45
Date of Receipt: 10 04 2001
Amount of Each Receipt this Period: $260.67
Rental Income
Transaction ID: SA17.94444

SUBTOTAL of Receipts This Page (optional) ..... ▶ 24833.72

TOTAL This Period (last page this line number only) ..... ▶

FEC Schedule A (Revised 1/2001)

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

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

FOR LINE NUMBER: PAGE 197 / 280
(check only one)
☐ 11a ☐ 11b ☐ 11c ☐ 12
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BLACK AMERICA'S POLITICAL ACTION COMMITTEE

A. Full Name (Last, First, Middle Initial)
Omega List Company
Mailing Address
1420 Spring Hill Rd., Suite 480
City: McLean State: VA Zip Code: 22031
FEC ID number of contributing federal political committee.
Name of Employer | Occupation
Receipt For: Primary General Other (specify) ▼
Aggregate Year-to-Date ▼ 62352.93

Date of Receipt: 10 30 2001
Amount of Each Receipt this Period: 491.50
Rental Income
Transaction ID: SA17.94440

B. Full Name (Last, First, Middle Initial)
Omega List Company
Mailing Address
1420 Spring Hill Rd., Suite 480
City: McLean State: VA Zip Code: 22031
FEC ID number of contributing federal political committee.
Name of Employer | Occupation
Receipt For: Primary General Other (specify) ▼
Aggregate Year-to-Date ▼ 67730.19

Date of Receipt: 11 02 2001
Amount of Each Receipt this Period: 5377.24
Rental Income
Transaction ID: SA17.94441

C. Full Name (Last, First, Middle Initial)
Omega List Company
Mailing Address
1420 Spring Hill Rd., Suite 480
City: McLean State: VA Zip Code: 22031
FEC ID number of contributing federal political committee.
Name of Employer | Occupation
Receipt For: Primary General Other (specify) ▼
Aggregate Year-to-Date ▼ 72219.10

Date of Receipt: 11 05 2001
Amount of Each Receipt this Period: 4488.91
Rental Income
Transaction ID: SA17.94396

SUBTOTAL of Receipts This Page (optional) ▶ 10357.65

TOTAL This Period (last page this line number only) ▶

FEC Schedule A (Revised 1/2001)

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

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

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BLACK AMERICA'S POLITICAL ACTION COMMITTEE

A.
Full Name (Last, First, Middle Initial)
Omega Ltd Company
Mailing Address
1420 Spring Hill Rd., Suite 490
City: McLean State: VA Zip Code: 22031
FEC ID number of contributing federal political committee.
Name of Employer
Occupation
Receipt for: Primary General
Other (specify) ▼
Aggregate Year-to-Date ▼ 81837.55
Date of Receipt: 12 02 2001
Amount of Each Receipt this Period: 9838.28
Rental Income
Transaction ID: SA17.94434

B.
Full Name (Last, First, Middle Initial)
Omega Ltd Company
Mailing Address
1420 Spring Hill Rd., Suite 490
City: McLean State: VA Zip Code: 22031
FEC ID number of contributing federal political committee.
Name of Employer
Occupation
Receipt For: Primary General
Other (specify) ▼
Aggregate Year-to-Date ▼ 88586.84
Date of Receipt: 12 20 2001
Amount of Each Receipt this Period: 4731.56
Rental Income
Transaction ID: SA17.94435

C.

SUBTOTAL of Receipts This Page (optional) ▶ 14569.84

TOTAL This Period (last page this line number only) ▶ 78545.53

FEC Schedule A (Revised 1/2001)