



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

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

Identification Number: C00159319

DEC 13 2000

Reference: July Quarterly Report (4/1/00-6/30/00)

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 B supporting Line 23 of your report discloses a contribution(s) to a candidate(s) for the primary election; however, the funds were disbursed after the election date(s) (pertinent portion(s) attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign. Please clarify the contribution(s) and disclose any redesignations or refunds as necessary on the appropriate schedules.

-Schedule A supporting Line 17 of your report discloses a payment from Omega List Company. It appears this receipt was for goods and/or services provided by your committee. 11 CFR §100.7(a)(1)(iii) states that "...the provision of any goods or services without charge or at a charge which is less than the usual and normal charge for such goods or services is a contribution." Examples of goods and services include equipment, supplies, personnel, advertising services, membership lists, and mailing lists. 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".

Furthermore, Advisory Opinion 1986-14 states "...to avoid treatment as a contribution, the sale/purchase price paid to the political committee may not

exceed the "usual and normal charge". 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 less 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)

-Please amend Schedule B supporting Line 23 by providing the office sought (House or Senate) for each contribution made. 11 CFR §104.3(b)(3)(ii) and (v)

-On Schedule A supporting Line 17 of the Detailed Summary Page, you have failed to include the aggregate year-to-date totals. Please amend your report to include the omitted information.

A written response or an 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. 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
Reports Analyst
Reports Analysis Division

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE 1 OF 1
FOR LINE NUMBER 23

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 PAC

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Virgil Goode for Congress 115 Orchard Ave. Rocky Mount VA 24151 U.S. Congress - Virginia - 5th Dist.	Contribution Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5-8-00	1000.00 AK
Walter Jones for Congress 8384 Six Forks Rd # 203 Raleigh NC 27615 U.S. Congress - N. Carolina - 3rd Dist	Contribution Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) NCLP was 5/2/00	5-8-00	1000.00
Bob Schaffer for Congress P.O. Box 1929 Fort Collins, Colo. U.S. Congress - Colo. 4th Dist	Contribution Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	5-8-00	1000.00
Mike Rothfeld for Congress P.O. Box 5421 Fredericksburg VA 22403 U.S. Congress - Virginia - 1st Dist	Contribution Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6-6-00	5000.00
Koster for Congress P.O. Box 3395 Arlington WA 98023 U.S. Congress - Washington - 2nd Dist	Contribution Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6-30-00	2500.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

10,500.00

