



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-5

John Wirtz, Treasurer
PENNEYPAC - JC Penney Co. Inc.
Political Action Committee
1156 15th Street, Suite 502
Washington, DC 20005

JAN 5 2001

Identification Number: C00042895

Reference: October Monthly Report (9/1/00-9/30/00)

Dear Mr. Wirtz:

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.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an impermissible contribution for an election which has already occurred, you should notify the recipient and request a refund and/or notify the recipient in writing of your redesignation of the contribution. In the best interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

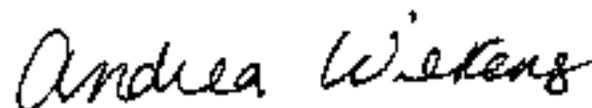
Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo

entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

Any amendment or clarification should be filed with the Federal Election Commission. 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,



Andrea Wilkens
Senior Reports Analyst
Reports Analysis Division

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

16 / 16

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)
PENNEY PAC - JCPENNEY COMPANY, INC

Full Name, Mailing Address, and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Jim Moran 1225 19th Street NW Suite 600 Washington DC 20038	House (D-08-VA) YTD 1000.00 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	09/20/2000	1000.00
Barl Gordon Post Office Box 2008 Murfreesboro TN 37133	House (D-06-TN) YTD 1000.00 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	09/22/2000	1000.00
J.D. Hayworth 4451 Brookfield Corporate Dr Suite 200 Chantilly VA 20151	House (R-08-AZ) YTD 1000.00 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	09/22/2000	1000.00
E. Clay Shaw Post Office Box 2188 Ft. Lauderdale FL 33303-2188	House (R-22-FL) YTD 1000.00 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	08/22/2000	1000.00
Billy Tauzin Post Office Box 1407 Thibodaux LA 70302	House (R-03-LA) YTD 1000.00 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	08/22/2000	1000.00
Ed Bryant Post Office Box 2778 Arlington VA 22202	House (R-07-TN) YTD 600.00 Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	08/25/2000	500.00
Tom Latham 4010 Franconia Rd Alexandria VA 22310	House (R-05-VA) YTD 2000.00 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	09/27/2000	2000.00
E. Clay Shaw Post Office Box 2188 Ft. Lauderdale FL 33303-2188	House (R-22-FL) YTD 2000.00 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	09/28/2000	1000.00

Primary date: 8/3/00

SUBTOTALS of Disbursements This Page (Optional)

TOTALS This Period (last page this line number only)

35000.00

