



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 12 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: PAGE 88 / 132

(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)  
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 ▼  
37024.11

Date of Receipt  
M N D D / Y Y Y  
07 01 2001  
Amount of Each Receipt this Period  
3358.44  
List Rental Income  
Transaction ID: SA17.4808

**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 ▼  
37929.73

Date of Receipt  
M N D D / Y Y Y  
08 01 2001  
Amount of Each Receipt this Period  
805.62  
List Rental Income  
Transaction ID: SA17.4610

**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 ▼  
38162.00

Date of Receipt  
M N D D / Y Y Y  
09 09 2001  
Amount of Each Receipt this Period  
1332.27  
List Rental Income  
Transaction ID: SA17.4611

SUBTOTAL of Receipts This Page (optional) ..... ▶ 5496.33  
TOTAL This Period (last page this 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 69 / 132	
<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12	<input type="checkbox"/> 13	<input checked="" type="checkbox"/> 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		Date of Receipt M / D / Y Y Y Y 10 / 07 / 2001	
Mailing Address 1420 Spring Hill Rd		Amount of Each Receipt this Period 673.77	
City McLean	State VA	Zip Code 22103	List Rental Income
FEC ID number of contributing federal political committee.		Transaction ID: SA17.4612	
Name of Employer	Occupation	Receipt For: Primary General Other (specify) ▼	
Aggregate Year-to-Date ▼ 39835.77			

B. Full Name (Last, First, Middle Initial) Omega List Company		Date of Receipt M / D / Y Y Y Y 11 / 01 / 2001	
Mailing Address 1420 Spring Hill Rd		Amount of Each Receipt this Period 5367.81	
City McLean	State VA	Zip Code 22103	List Rental Income
FEC ID number of contributing federal political committee.		Transaction ID: SA17.4613	
Name of Employer	Occupation	Receipt For: Primary General Other (specify) ▼	
Aggregate Year-to-Date ▼ 45203.68			

C. Full Name (Last, First, Middle Initial) Omega List Company		Date of Receipt M / D / Y Y Y Y 11 / 01 / 2001	
Mailing Address 1420 Spring Hill Rd		Amount of Each Receipt this Period 8124.08	
City McLean	State VA	Zip Code 22103	List Rental Income
FEC ID number of contributing federal political committee.		Transaction ID: SA17.4614	
Name of Employer	Occupation	Receipt For: Primary General Other (specify) ▼	
Aggregate Year-to-Date ▼ 54327.77			

SUBTOTAL of Receipts This Page (optional) ..... ▶ 15165.77

TOTAL This Period (last page this 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: PAGE 70 / 132

(check only one)

<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 checked="" type="checkbox"/> 16
			<input type="checkbox"/> 17

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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 11 / 01 / 2001
Mailing Address 1420 Spring Hill Rd		Amount of Each Receipt this Period 3711.92
City McLean	State Zip Code VA 22103	
FEC ID number of contributing federal political committee.		List Rental Income
Name of Employer	Occupation	Transaction ID: SA17.4615
Receipt For: Primary General Other (specify) ▼	Aggregate Year-to-Date ▼ 58039.69	

Full Name (Last, First, Middle Initial) B. Omega List Company		Date of Receipt M M / D D / Y Y Y Y 12 / 01 / 2001
Mailing Address 1420 Spring Hill Rd		Amount of Each Receipt this Period 476.44
City McLean	State Zip Code VA 22103	
FEC ID number of contributing federal political committee.		List Rental Income
Name of Employer	Occupation	Transaction ID: SA17.4616
Receipt For: Primary General Other (specify) ▼	Aggregate Year-to-Date ▼ 56516.13	

Full Name (Last, First, Middle Initial) C. Omega List Company		Date of Receipt M M / D D / Y Y Y Y 12 / 01 / 2001
Mailing Address 1420 Spring Hill Rd		Amount of Each Receipt this Period 4106.58
City McLean	State Zip Code VA 22103	
FEC ID number of contributing federal political committee.		List Rental Income
Name of Employer	Occupation	Transaction ID: SA17.4617
Receipt For: Primary General Other (specify) ▼	Aggregate Year-to-Date ▼ 62822.71	

SUBTOTAL of Receipts This Page (optional) ..... ▶ 8284.94

TOTAL This Period (last page this 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: PAGE 71 / 132

(check only one)  
 11a  11b  11c  12  
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NAME OF COMMITTEE (In Full)  
Justice Political Action Committee

**AK**

Full Name (Last, First, Middle Initial) A. Omega Jet Company		Date of Receipt M / D / Y Y Y Y 12 / 16 / 2001	
Mailing Address 1420 Spring Hill Rd		Amount of Each Receipt This Period 3187.17	
City McLean	State VA	Zip Code 22103	List Rental Income
FEC ID number of contributing federal political committee.		Transaction ID: SA17.481B	
Name of Employer	Occupation	Aggregate Year-to-Date 65808.88	
Receipt For: Primary General Other (specify) ▼			

B.

C.

SUBTOTAL of Receipts This Page (optional)	3187.17
TOTAL This Period (last page this line number only)	32144.21

